

1 #70). Seham's repeated threats to file Rule 11 motions show that it
2 filed its Rule 11 Motion solely as a litigation tactic.¹ Moreover, Seham's
3 Rule 11 motion is frivolous because any competent attorney would
4 conclude it is destined to fail. The Court should, therefore, sanction
5 Seham pursuant to Rule 11(b)(1). This motion is supported by the
6 *Memorandum of Points and Authorities* that follows.

7 Dated this 18th of January, 2011.

8 POLSINELLI SHUGHART, PC

9 /s/ Andrew S. Jacob

10 By _____

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¹ References to "Rule" are to the Federal Rules of Civil Procedure.