

**IN THE CIRCUIT COURT OF UNION COUNTY, ARKANSAS CIVIL DIVISION**

STATE OF ARKANSAS, ex rel. )  
TIM GRIFFIN, ATTORNEY GENERAL, )  
 )  
 *Plaintiff,* )  
 )  
 v. )  
 )  
TIKTOK INC., TIKTOK PTE. LTD., )  
BYTEDANCE INC., and )  
BYTEDANCE LTD., )  
 )  
 *Defendants.* )

**Case No. 70CV-23-135**

**DEFENDANTS' MOTION TO DISMISS**

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*Counsel for Defendants TikTok Inc., TikTok Pte. Ltd., ByteDance Inc., and  
ByteDance Ltd.*

Pursuant to Rules 12(b)(2) and 12(b)(6) of the Arkansas Rules of Civil Procedure, Defendants TikTok Inc., TikTok Pte. Ltd., ByteDance Inc., and ByteDance Ltd. (“Defendants”) move the Court to enter an order dismissing Plaintiff’s Complaint, and for all other relief to which they may be entitled. For grounds, Defendants state:

1. Plaintiff has not alleged facts establishing personal jurisdiction over any of the Defendants.

2. Plaintiff’s Complaint does not allege any facts that, when properly taken as true, establish a claim for relief.

For these reasons, Defendants request that the Court grant its motion and dismiss this action.

This motion is supported by the pleadings filed in this action and by a supporting memorandum filed contemporaneously with this motion, all of which are adopted herein by this reference.

WHEREFORE, Defendants move this Court to enter an order dismissing Plaintiff’s Complaint, and for all other relief to which they may be entitled.

Dated: September 15, 2023

Respectfully submitted,  
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By: \_\_\_\_\_  
Scott A. Irby (99192)  
Jessica Pruitt Koehler (2015226)

**CERTIFICATE OF SERVICE**

I hereby certify that on September 15, 2023, I served the foregoing via ECF filing on all counsel of record.



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Scott A. Irby