

IN THE CIRCUIT COURT OF HAMILTON COUNTY, TENNESSEE

CHARLESETTA WOODARD	)	
THOMPSON,	)	
	)	
Plaintiff,	)	NO. 13C979
	)	
v.	)	DIVISION IV
	)	
CHATTANOOGA-HAMILTON	)	JURY DEMAND
COUNTY HOSPITAL AUTHORITY,	)	
d/b/a ERLANGER HEALTH SYSTEM,	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO DISMISS**  
**PLAINTIFF’S CONSPIRACY CLAIMS**

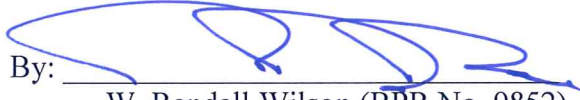
Defendant Chattanooga-Hamilton County Hospital Authority, doing business as Erlanger Health System (“Erlanger”), by and through counsel, moves to dismiss Plaintiff’s conspiracy claims pursuant to Tennessee Rule of Civil Procedure 12.02(6).

In support of this motion, Erlanger relies upon the Complaint and the supporting memorandum of law filed herewith, to which the Court’s attention is respectfully directed.

This motion shall be heard on September 16, 2013, at 9:00 a.m. Failure to file and serve a timely written response will result in the motion being granted without further hearing.

Respectfully submitted,

MILLER & MARTIN PLLC

By:   
W. Randall Wilson (BPR No. 9852)  
John R. Bode (BPR No. 11415)

Suite 1000, Volunteer Building  
832 Georgia Avenue  
Chattanooga, TN 37402  
Telephone: 423-756-6600  
Facsimile: 423-785-8293

Attorneys for Defendant

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that an exact copy of this pleading has been served upon counsel for all parties in this action, or upon said parties themselves as required by law, by delivering a copy thereof, or by depositing a copy of the same in the United States Mail, with sufficient postage affixed thereto to ensure delivery to the following:

Jennifer H. Lawrence, Esq.  
Lawrence & Lawrence, PLLC  
P.O. Box 1297  
Chattanooga, TN 37401

This 3<sup>RD</sup> day of September, 2013.

By:  \_\_\_\_\_