

3. Moreover, and presented only in the alternative if the Court were to determine that jurisdiction and venue are proper in this forum (which they are not for the reasons given above), Twitter moves to dismiss this action on forum non conveniens grounds pursuant to Va. Code § 8.01-265. Forum non conveniens principles dictate that this lawsuit be brought where the witnesses, evidence, and operative facts will overwhelmingly be found—here, California—and not in a forum that has only a tangential relationship to this dispute.

4. In support of this motion, Twitter relies upon and incorporates herein the arguments and authorities contained in its contemporaneously-filed memorandum in support of this motion.

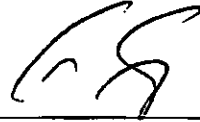
WHEREFORE, Specially-Appearing Defendant Twitter, Inc. respectfully requests that the Court grant this Motion, dismiss this action and all claims against it without prejudice, and grant such other relief as the Court deems just and proper.

Dated: May 9, 2019

Respectfully submitted,

TWITTER, INC.

By Counsel



Charles K. Seyfarth (VSB No. 44530)
Elizabeth Scott Turner (VSB No. 88056)
O'HAGAN MEYER
411 East Franklin Street, Suite 500
Richmond, Virginia 23219
Telephone: (804) 403-7137
Facsimile: (804) 403-7110
cseyfarth@ohaganmeyer.com
eturner@ohaganmeyer.com

Patrick J. Carome
Ari Holtzblatt
WILMER CUTLER PICKERING HALE & DORR LLP
1875 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
Telephone: (202) 663-6000
Facsimile: (202) 663-6363
patrick.carome@wilmerhale.com
ari.holtzblatt@wilmerhale.com

*Counsel for Specially-Appearing Defendant
Twitter, Inc.*