

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

FRANCISCO JAVIER ZAVALA MARTINEZ,	:	CIVIL ACTION NO. 3:24-cv-01900-VAB
et al.,	:	
	:	
Plaintiffs	:	
v.	:	
	:	
MANZANA, LLC, et al.	:	
	:	
Defendants	:	FEBRUARY 18, 2025

DEFENDANTS’ PARTIAL MOTION TO DISMISS PLAINTIFFS’ COMPLAINT

Defendants, Manzana, LLC, Lawrence Williams, N. Casertano Greenhouses & Farms, Inc., and John Casertano, pursuant to Fed. R. Civ. P. 12(b)(6), hereby move this Court to dismiss Plaintiffs’ Complaint for failure to state a claim upon which relief can be granted. As the Complaint spans 60 pages and 327 numbered paragraphs, Defendants refer the Court to the accompanying Memorandum of Law for the specific Counts of the Complaint and Defendants against whom they are asserted that Defendants ask the Court to dismiss.

The claims of violations of the Trafficking Victims Protection Act, in particular, fail to state claims upon which relief can be granted, and the contract and wage claims are asserted against parties who were not Plaintiffs’ employers. For these reasons, set forth in more detail in Defendants’ Memorandum of Law filed contemporaneously with this Motion, Defendants respectfully move this Court for an order partially dismissing Plaintiffs’ Complaint.

Respectfully submitted on this 18th day of February, 2025.

[Signature on next page]

Respectfully submitted,

DEFENDANTS
MANZANA, LLC; LAWRENCE WILLIAMS;
N. CASERTANO GREENHOUSES & FARMS,
INC.; JOHN CASERTANO

By their attorneys,

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-and-

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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February 2025, a copy of the foregoing was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Kevin R. Brady
Kevin R. Brady