UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA, Plaintiff, v. ERIC ANTHONY NEPUTE, individually, and as Owner of Quickwork LLC; and QUICKWORK LLC, a limited liability company, also d/b/a WELLNESS WARRIOR, Defendants.	Case No.: 4:21-cv-00437-RLW

DEFENDANT QUICKWORK LLC'S REPLY TO GOVERNMENT'S OPPOSITION TO MOTION TO DISMISS

Defendant Quickwork LLC ("Quickwork"), by and through its undersigned counsel, hereby replies to the Government's Opposition to its Motion to Dismiss, or in the alternative strike, all of Plaintiff's claims seeking monetary relief, and in support thereof, states as follows:

1. On April 15, 2021, Plaintiff filed a Complaint for Civil Penalties, Permanent Injunction, and Other Relief against Defendants (the "Complaint").

2. In the Complaint, Plaintiff seeks, *inter alia*, monetary relief from Defendants.

3. On June 3, 2021, Defendant Dr. Eric Nepute ("Dr. Nepute") filed a Motion to Dismiss, or in the Alternative Strike, Plaintiff's Claims Seeking Monetary Relief and a Memorandum in Support thereof.

4. On June 18, 2021, Defendant Quickwork adopted and joined in Defendant Dr.

Nepute's Motion to Dismiss, or in the Alternative Strike, Plaintiff's Claims Seeking Monetary Relief and Memorandum in support thereof.

5. Defendant Dr. Nepute also moved this Court to enter sanctions against Plaintiff.

6. Defendant Quickwork did not adopt or join in Defendant Dr. Nepute's Motion for Sanctions.

7. On June 17, 2021, the Government filed its Opposition to Dr. Nepute's Motion to Dismiss.

8. On June 28, 2021, Dr. Nepute filed his Reply to the Government's Opposition to the Motion to Dismiss.

9. Defendant Quickwork hereby adopts and joins in Defendant Dr. Nepute's Reply as it relates to Defendants' Motion to Dismiss, or in the Alternative Strike, Plaintiff's Claims Seeking Monetary Relief.

10. Defendant Quickwork does not adopt or join in Defendant Dr. Nepute's Reply as it relates to his Motion for Sanctions.

WHEREFORE, Defendant Quickwork LLC respectfully requests:

1. That the Court dismiss, or in the alternative strike, Plaintiff's claims for monetary relief;

2. That the Court order such other and further relief as it deems just and proper.

Dated: June 28, 2021

Respectfully submitted,

THOMPSON COBURN LLP

By: /s/ Jan Paul Miller

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Attorneys for Quickwork, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of June, 2021, I filed the foregoing motion via the Court's CM/ECF system, effecting service upon all counsel of record.

/s/ Jan Paul Miller