

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No. 1:19-cv-00954

JINHUA ZOU, an individual, YU XIA
LU, an individual, CHUANJIE YANG,
an individual; OLLIE LAN aka
RUONING LAN, an individual; LIU
LIU, an individual, and all those
similarly situated,

Plaintiffs,

vs.

MARKET AMERICA, INC., a North
Carolina Corporation, *et al.*,

Defendants.

**REVISED MOTION TO COMPEL
ARBITRATION**

On October 11, 2019, Plaintiffs filed a First Amended Complaint in this matter. (Dkt. # 52.) That First Amended Complaint makes no salient substantive changes concerning the issue of arbitration from Plaintiffs' initial Complaint filed in this action. (Dkt. # 1.)

Therefore, pursuant to the Federal Arbitration Act ("FAA"), 9 U.S.C. § 1, *et seq.*, Defendants, through counsel, hereby submit this Revised Motion to Compel Arbitration based on the fact that the Plaintiffs entered into a valid arbitration agreement that governs this dispute.

In support of this Motion, Defendants rely on the Petition to Compel Arbitration, previously filed in the related case, *Market America, Inc., et al. v. Zou, et al.*, 1:19-cv-

00315 (U.S.D.C., M.D.N.C.), and attached to their original Motion to Compel Arbitration (Dkt. # 37), as Exhibit A (Dkt. # 37-1).

Defendants further refer to the Memorandum in Support of their Motion to Compel Arbitration (Dkt. # 38), and hereby incorporate it by this reference.

WHEREFORE, Defendants respectfully request that their Revised Motion to Compel Arbitration be granted.

This, the 30th day of October, 2019.

WOMBLE BOND DICKINSON (US) LLP

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