

## Bell Atlantic v. Twombly: Supreme Court Rejects Decades Old Pleading Formulation

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In *Bell Atlantic Corp. v. Twombly*, the Supreme Court rejected language it adopted fifty years ago - in the often-cited 1957 *Conley v. Gibson* case - to lay out the standard for a pleading sufficient to survive a motion to dismiss under Rule 12(b)(6). The decision reversed a Second Circuit decision that had itself overturned an order dismissing an antitrust complaint.