

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

PRO-FOOTBALL, INC.,

Plaintiff,

v.

AMANDA BLACKHORSE, MARCUS
BRIGGS-CLOUD, PHILLIP GOVER, JILLIAN
PAPPAN, and COURTNEY TSOTIGH,

Defendants,

and

UNITED STATES OF AMERICA,

Intervenor.

Civil Action No. 1:14-cv-1043-GBL-IDD

**PRO-FOOTBALL, INC.’S CROSS-MOTION FOR SUMMARY JUDGMENT ON
CLAIMS I, II, AND VII**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Pro-Football, Inc. (“PFI”) cross-moves the Court to enter summary judgment in its favor on Claims I, II, and VII of its Complaint [Dkt. 1]. The grounds and reasons for granting this relief are stated with particularity in PFI’s accompanying Memorandum of Law (which also is in opposition to Defendants’ motion for summary judgment [Dkt. 69]) and the accompanying declarations of Jessica Rose, Esq., Bruce Allen, David Barnhart, Hart Blanton, Ronald Butters, and Jacob Jacoby, and the exhibits thereto.

Dated: March 19, 2015

Respectfully submitted,

/s/ Craig C. Reilly

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Counsel for Plaintiff Pro-Football, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2015, I caused the foregoing pleading or paper to be filed and served electronically by the Court's CM/ECF system upon all registered users in this action:

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