

**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 MOTION FOR SUMMARY JUDGMENT ON
CONSTITUTIONAL CLAIMS III-VI**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Pro-Football, Inc. moves the Court to enter summary judgment in its favor on Claims III-VI of its Complaint [Dkt. 1]. The grounds and reasons for granting this relief are stated with particularity in PFI's accompanying Memorandum of Law in Support of Its Motion for Summary Judgment on Constitutional Claims III – VI and brief and the accompanying declarations of Todd Anten and Jeffery A. Handelman.

Dated: February 23, 2015

Respectfully submitted,

/s/ Craig C. Reilly

Craig C. Reilly, Esq. (VSB # 20942)

craig.reilly@ccreillylaw.com

THE LAW OFFICE OF CRAIG C. REILLY

111 Oronoco Street

Alexandria, Virginia 22314

Tel: (703) 549-5354

Fax: (703) 549-5355

Robert L. Raskopf (*pro hac vice*)

robertraskopf@quinnemanuel.com

Todd Anten (*pro hac vice*)

toddanten@quinnemanuel.com

Claudia T. Bogdanos (*pro hac vice*)

claudiabogdanos@quinnemanuel.com

Jessica A. Rose (*pro hac vice*)

jessicarose@quinnemanuel.com

Jennifer D. Bishop (*pro hac vice*)

jenniferbishop@quinnemanuel.com

QUINN EMANUEL URQUHART & SULLIVAN, LLP

51 Madison Avenue, 22nd Floor

New York, New York 10010

Tel: (212) 849-7000

Fax: (212) 849-7100

Counsel for Plaintiff Pro-Football, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on February 23, 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, including the following counsel of record:

Jesse A. Witten
Jeffrey J. Lopez
Adam Scott Kunz
Tore T. DeBella
Jennifer Criss
DRINKER BIDDLE & REATH LLP
1500 K Street, N.W., Suite 1100
Washington, D.C. 20005-1209
Tel : (202) 842-8800
Fax : (202) 842-8465
Jesse.Witten@dbr.com
Jeffrey.Lopez@dbr.com
Adam.Kunz@dbr.com
Tore.DeBella@dbr.com
Jennifer.Criss@dbr.com

Dated: February 23, 2015

/s/ Craig C. Reilly
Craig C. Reilly, Esq. (VSB # 20942)
craig.reilly@ccreillylaw.com
THE LAW OFFICE OF CRAIG C. REILLY
111 Oronoco Street
Alexandria, Virginia 22314
Tel: (703) 549-5354
Fax: (703) 549-5355