

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.

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

**DEFENDANTS' MOTION  
FOR PARTIAL SUMMARY JUDGMENT ON COUNTS 3 THROUGH 6**

COME NOW, pursuant to Federal Rule of Civil Procedure 56, Local Civil Rule 56, and this Court's Scheduling Order, Defendants Amanda Blackhorse, Marcus Briggs-Cloud, Phillip Gover, Jillian Pappan, and Courtney Tsothigh, by and through counsel, and hereby respectfully move this Court for partial Summary Judgment on Counts 3 through 6 of Plaintiff Pro-Football, Inc.'s Complaint. Defendants respectfully direct the Court's attention to their Memorandum In Support Of Their Motion For Partial Summary Judgment On Counts 3 Through 6 And In Opposition To Plaintiff's Motion For Summary Judgment On Constitutional Claims III-VI and Exhibits thereto, submitted in support of this Motion.

WHEREFORE, for the reasons above and provided in Defendants' Memorandum, Defendants respectfully pray that the Court grant this Motion, enter the attached Proposed Order granting partial Summary Judgment in favor of Defendants, and to award to Defendants such other and further relief as the Court deems to be just and proper.

Dated: March 23, 2015.

Respectfully submitted,

/s/ Jeffrey J. Lopez

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of March, 2015, the foregoing pleading or paper was filed and served electronically by the Court's CM/ECF system upon all registered users in this action:

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