

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GAMES WORKSHOP LIMITED,

Plaintiff,

v.

CHAPTERHOUSE STUDIOS LLC and JON
PAULSON d/b/a PAULSON GAMES

Defendants.

Civil Action No. 1:10-cv-8103

Hon. Matthew F. Kennelly
Hon. Jeffrey T. Gilbert

PLAINTIFF GAMES WORKSHOP'S MOTION FOR SUMMARY JUDGMENT IN PART

Games Workshop Limited hereby moves for summary judgment in part under Fed.R.Civ.P. Rule 56 (i) finding that Chapterhouse is without standing to challenge Games Workshop's ownership of copyright in all of the works at issue herein; (ii) confirming that Games Workshop has made prior use in commerce of its trademarks; (iii) dismissing defendant's affirmative defenses of fraud on the Copyright Office and the Trademark Office; (iv) dismissing defendant's defense of copyright fair use; (v) dismissing defendant's affirmative defense of preemption; and (vi) dismissing defendant's remaining affirmative defenses. This motion is supported by the accompanying declaration of Jonathan E. Moskin, Plaintiff's Statement of Undisputed Fact and the accompanying Memorandum of Law.

Dated: March 4, 2013

Respectfully submitted,

/s/ Jonathan E. Moskin

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CERTIFICATE OF SERVICE

I, Jonathan E. Moskin, an attorney, hereby certify that on March 4, 2013, I caused to be filed electronically the foregoing MOTION FOR SUMMARY JUDGMENT IN PART with the Clerk of the Court using the CM/ECF system, which will send an electronic copy of the foregoing to counsel of record and constitutes service under Federal Rule of Civil Procedure 5(b)(2)(D) pursuant to Local Rule 5.9 of the Northern District of Illinois.

/s/ Jonathan E. Moskin
Jonathan E. Moskin