

**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

Games Workshop Limited hereby moves for summary judgment under Fed.R.Civ.P. Rule 56 (i) finding that Games Workshop is the owner of copyright in all of the works at issue herein; (ii) dismissing defendant's defense of independent creation; (iii) dismissing defendant's defense that some unspecified number of sculptural works of plaintiff may not enforceable under English copyright law; (iv) finding that the entirety of defendant's product offering as well as individual products infringe Games Workshop's copyrights in its Warhammer 40,000 works and (v) finding that defendant's unauthorized use of Games Workshop's registered and unregistered trademarks constitutes trademark infringement. This motion is supported by the accompanying declarations of Alan Merrett, Andrew Jones, Jonathan Moskin and Jason Keener, Plaintiff's Statement of Undisputed Fact and the accompanying Memorandum of Law.

Dated: August 14, 2012

Respectfully submitted,

/s/ Jason J. Keener _____

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CERTIFICATE OF SERVICE

I, Jason J. Keener, an attorney, hereby certify that on August 14, 2012, I caused to be filed electronically the foregoing PLAINTIFF GAMES WORKSHOP'S MOTION FOR SUMMARY JUDGMENT 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/ Jason J. Keener
Jason J. Keener