

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

KATHLEEN MOLLER	*	CIVIL ACTION NO. 24-0228-WBV-DPC
	*	ALL CASES
	*	
VERSUS	*	JUDGE WENDY B. VITTER
	*	
MARTIAN SALES, INC; JOPEN, LLC,	*	MAGISTRATE DONNA PHILLIPS
a Texas limited liability company;	*	CURRAULT
JOHNSON FOODS, LLC, a Wyoming	*	
limited liability company; NUZA, LLC, a	*	
Wyoming limited liability company;	*	
CALIBRE MANUFACTURING, LLC, a	*	
Wyoming limited liability company; LP	*	
IND., LLC, a Wyoming limited liability	*	
company; CAG HOLDINGS, LLC, a	*	
Wyoming limited liability company;	*	
RMH HOLDINGS, INC., a Wyoming	*	
corporation; FMK GROUP, INC., a	*	
Wyoming corporation; PNW	*	
HOLDINGS, LLC, a Wyoming limited	*	
liability company; CC US HOLDINGS,	*	
LLC, a Wyoming limited liability	*	
company; PEYTON SHEA PALAIO;	*	
MARK JENNINGS; EYAL DAVID	*	
GABBAY; and MARK REILLY.	*	
*****	*	

MOTION FOR PARTIAL SUMMARY
JUDGMENT REGARDING COMPARATIVE FAULT

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Kathleen Moller, who moves this Court for an Order of partial summary judgment against Defendants, Martian Sales, Inc., JOpen, LLC, Johnson Foods, LLC, Nuza, LLC, Calibre Manufacturing, LLC, LP IND., LLC, CAG Holdings, LLC, RMH Holdings, Inc., FMK Group, Inc., PNW Holdings, LLC, CC US Holdings, LLC, Peyton Shea Palaio, Mark Jennings, Eyal David Gabbay, and Mark Reilly precluding any claim of comparative fault from this matter, all as for good cause and as fully shown in the Memorandum in Support, attached hereto.

WHEREFORE, Plaintiff, Kathleen Moller, respectfully requests an Order be issued by this Court granting her Motion for Partial Summary Judgment Regarding Comparative Fault.

Respectfully submitted:

/s/ Michael Cowgill

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