

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF CONNECTICUT

BRUCE KIRBY, INC., and
BRUCE KIRBY

Plaintiffs,

vs.

LASERPERFORMANCE (EUROPE) LIMITED,
QUARTER MOON, INCORPORATED,
KARAYA (JERSEY) LIMITED,
VELUM LIMITED ITM SA (ANTIGUA AND
BARBUDA),
INTERNATIONAL SAILING FEDERATION
LIMITED,
INTERNATIONAL LASER CLASS
ASSOCIATION, and
FARZAD RASTEGAR

Defendants.

LASERPERFORMANCE (EUROPE)
LIMITED, and
QUARTER MOON, INCORPORATED,

Defendants-Counterclaim Plaintiffs,

vs.

BRUCE KIRBY, INC., and
BRUCE KIRBY,

Plaintiffs-Counterclaim Defendants,

and

GLOBAL SAILING LIMITED, and
PERFORMANCE SAILCRAFT PTY. LTD.,

Additional Counterclaim Defendants.

Civil Action No. 3:13-cv-00297-JAM

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiffs Bruce Kirby and Bruce Kirby, Inc. (“Plaintiff” or “Kirby”) move pursuant to Rule 56 of the Federal Rules of Civil Procedure for summary judgment dismissing Defendant Quarter Moon, Inc.’s and Defendant Laser Performance (Europe) Ltd.’s (collectively and individually “Defendant” or “Laser Performance”)¹ third, fourth, fifth, sixth, seventh, eighth, and, ninth counterclaims.

In support of this motion, Plaintiff is concurrently submitting herewith a Supporting Memorandum of Law, the Declaration of Walter B. Welsh, Esq., and a Local Rule 56(a)(1) Statement.

Respectfully submitted,

January 20, 2015

/s/ Andy I. Corea

Wesley W. Whitmyer, Jr., ct03509

Andy I. Corea, ct25925

Walter B. Welsh, ct01220

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ATTORNEYS FOR PLAINTIFFS

BRUCE KIRBY and BRUCE KIRBY, INC.

¹ Quarter Moon and LaserPerformance filed a joint answer and counterclaims *See* Doc. No. 40.

CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2015, a copy of foregoing PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

January 20, 2015
Date

/s/ Joan M. Burnett
Joan M. Burnett