

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

RAFAL RUDNICKI	)	
	)	
Plaintiff,	)	
	)	Case Number: 04 C 5719
v.	)	
	)	Judge Rebecca Pallmeyer
WPNA 1490 AM, ALLIANCE	)	
COMMUNICATIONS, INC.,	)	Magistrate Judge Nolan
POLISH NATIONAL ALLIANCE OF	)	
THE UNITED STATES OF	)	
NORTH AMERICA	)	
	)	
Defendants.	)	

**DEFENDANTS' SUPPLEMENTAL MOTION  
FOR ENTRY OF FINAL JUDGMENT**

Defendants Alliance Communications, Inc. (“Alliance”) and Polish National Alliance of the United States of North America (“PNA”) (collectively “Defendants”) submit this supplemental motion for entry of final judgment in favor of the Defendants and against the Plaintiff on each of Plaintiff’s claims. On March 8, 2010, the Defendants presented a Motion for Entry of Final Judgment (Dkt 200-201, filed March 4, 2010) in which they outlined why the “Affirmation of Assignment of Rights by Rafal Rudnicki” does not conform to this Court’s December 10, 2009 ruling granting summary judgment by assigning or transferring to Plaintiff either RadioZET’s copyright infringement claims or any other rights belonging to RadioZET. That Motion remains pending. In support of this Supplemental Motion, Defendants have filed a memorandum in which they ask the Court to strike certain documents filed by the Plaintiff for failure to make the signatories of those documents available for deposition as previously ordered by the Court and to enter final judgment in favor of the Defendants and against the Plaintiff on all of the Plaintiff’s claims.

WHEREFORE, Defendants Alliance Communications, Inc. and Polish National Alliance of the United States of North America respectfully request that this Court strike the Affirmation of Assignment of Rights by Rafal Rudnicki and the Affidavits of Ms. Ceran and Ms. Moszczenska for failure to make the signatories of those documents available for deposition, enter final judgment in favor of the Defendants and against the Plaintiff on each of Plaintiff's claims and grant whatever further relief the Court deems proper.

Respectfully submitted,

ALLIANCE COMMUNICATIONS, INC.  
AND POLISH NATIONAL ALLIANCE OF  
THE UNITED STATES OF NORTH AMERICA

By: /s/ John D. Fitzpatrick  
One of their attorneys

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that he served the *Defendants' Supplemental Motion for Entry of Final Judgment*, a *Memorandum in Support of the Motion*, and a *Notice of Motion* on:

Nancy J. Richter  
Lukasz R. Cholodecki  
Gleason Law Group PC  
4653 N. Milwaukee Ave.  
Chicago, Illinois 60630

via the electronic filing system on this 27th day of May 2010.

/s/ John D. Fitzpatrick