

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

G & G CLOSED CIRCUIT EVENTS, LLC)
)
 Plaintiff,)
)
 v.)
)
)
 JAIME F. CASTILLO, et al.,)
)
 Defendants / Counter-Plaintiffs.)

Case No. 2014-cv-2073

PLAINTIFF’S FEDERAL RULE OF CIVIL PROCEDURE 50(a) MOTION

NOW COMES the Plaintiff, G & G Closed Circuit Events, LLC (hereinafter “Plaintiff”), by and through its attorneys of record, and files this Motion pursuant to Federal Rule of Civil Procedure 50(a).

ARGUMENT

Federal Rule of Civil Procedure 50(a) provides:

(a) Judgment as a Matter of Law.

(1) In General. If a party has been fully heard on an issue during a jury trial and the court finds that a reasonable jury would not have a legally sufficient evidentiary basis to find for the party on that issue, the court may:

(A) resolve the issue against the party; and

(B) grant a motion for judgment as a matter of law against the party on a claim or defense that, under the controlling law, can be maintained or defeated only with a favorable finding on that issue.

Fed.R.Civ.P. 50(a). Defendants purported to argue that they were induced by investigator Aaron Lockner to turn on the Program at issue herein. However, while defense counsel referenced this issue in her arguments, there was no testimony or evidence introduced from which reasonable jury could reach this conclusion. In light of the failure to elucidate any evidence on this issue, let

alone a legally sufficient evidentiary basis, the Court should grant judgment as a matter of law in favor of Plaintiff on this issue and find that Defendants were not induced by Plaintiff and/or Lockner to turn on the Program.

WHEREFORE, for the reasons set forth herein, Plaintiff respectfully requests that Plaintiff's Motion be granted , and that Plaintiff be awarded such other relief as may be just and proper.

Respectfully submitted,

ZANE D. SMITH & ASSOCIATES, LTD.

By: /s/ Boris Samovalov
Boris Samovalov

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CERTIFICATE OF SERVICE

I, Boris Samovalov, on oath state that a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court on January 10, 2019 using the CM/ECF system which will send notification of such filing(s) to all attorneys of record. Under the penalties of perjury, I certify that the above statements set forth herein are true and correct.

/s/ Boris Samovalov

Boris Samovalov

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