

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ALLGOOD ENTERTAINMENT, INC., and
ALLGOOD CONCERTS, LLC,

Civil Action No.: 1:09-cv-05377-HB

Plaintiffs,

ECF Case

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v.

JOHN BRANCA and JOHN McCLAIN
as Special Administrators of the ESTATE OF
MICHAEL JACKSON, DILEO
ENTERTAINMENT AND TOURING, INC.,
FRANK DILEO, ANSCHUTZ
ENTERTAINMENT GROUP, AEG LIVE,
LLC, and AEG LIVE NY, LLC,
Defendants.

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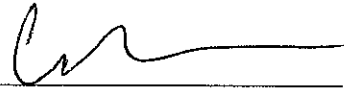
**NOTICE OF MOTION FOR SUMMARY JUDGMENT
BY DEFENDANTS FRANK DILEO AND
DILEO ENTERTAINMENT AND TOURING, INC.**

PLEASE TAKE NOTICE that, upon this Notice of Motion, the accompanying Memorandum of Law, the Declaration of Caroline J. Heller and exhibits annexed thereto, and the Local Rule 56.1 Statement of Material Facts Not in Dispute, Defendants Dileo Entertainment and Touring, Inc. and Frank Dileo (the "Dileo Defendants"), by their undersigned counsel, will move this Court, before the Honorable Harold Baer, Jr. of the United States District Court for the Southern District of New York, at Courtroom 23B of the United States Courthouse, 500 Pearl Street, New York, New York, 10017, on August, 1, 2010, for an Order pursuant to Federal Rule of Civil Procedure Rule 56 granting summary judgment in favor of the Dileo Defendants, dismissing Plaintiffs' Complaint in its entirety, and for such other and further relief as the Court deems just and proper, including reasonable costs and attorneys' fees.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall serve and file any Opposition to the motion on or before July 23, 2010, fourteen (14) days from the service and filing of this Notice of Motion, and that the Dileo Defendants shall serve and file any Reply on or before July 30, 2010, seven (7) days from the service and filing of any Opposition.

Dated: July 9, 2010
New York, New York

GREENBERG TRAURIG, LLP

By: 

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