

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

BEST VACUUM, INC,	)	<b>JUDGE HART</b>
	)	
Plaintiff,	)	
	)	
v.	)	<b>Civil Action No. 04 C 2249</b>
	)	
IAN DESIGN, INC.	)	
	)	
Defendant.	)	<b>JURY TRIAL DEMANDED</b>

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**DEFENDANT’S CROSS-MOTION FOR SUMMARY JUDGMENT**

NOW COMES Defendant Ian Design, Inc. (“Ian Design”), by its attorney, and respectfully moves for entry of an order, pursuant to Federal Rule of Civil Procedure 56, granting Ian Design summary judgment in its favor and against the Plaintiff Best Vacuum, Inc. (“Plaintiff”) on all Counts in the Plaintiff’s Complaint on the grounds that there is no genuine issue as to any material fact and that Ian Design is entitled to such judgment as a matter of law. Ian Design further moves for such other and further relief as to which it is entitled.

In support of its motion, Ian Design submits its accompanying Memorandum in Opposition to Plaintiff’s Motion for Summary Judgment and in Support of Defendant’s Cross-Motion for Summary Judgment as well as its Local Rule 56.1 Response to Plaintiff’s Local Rule 56.1 Statement, including its Statement of Additional Material Facts and exhibits attached thereto.

WHEREFORE, Ian Design respectfully prays for entry of an order, pursuant to Fed. R. Civ. P. 56, granting it summary judgment in its favor on all Counts in the Plaintiff's Complaint and for such other and further relief as to which it is entitled.

Dated: Chicago, IL  
February 23, 2006

Respectfully submitted,

DEFENDANT,  
IAN DESIGN, INC.

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