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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland Division

**OBSIDIAN FINANCE GROUP, LLC and
KEVIN D. PADRICK,**

Plaintiffs,

v.

CRYSTAL COX,

Defendant.

Civil No. CV 11-0057 HA

**PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY
JUDGMENT**

**(ORAL ARGUMENT
REQUESTED)**

L.R. 7.1 CERTIFICATION

The undersigned counsel of record for plaintiffs Obsidian Finance Group, LLC and Kevin D. Padrick ("Plaintiffs") hereby certifies that he made a good faith effort to resolve the issues raised in this Motion by telephone conference with defendant Crystal Cox ("Defendant"), but was unable to resolve the issues.

MOTION

Pursuant to Federal Rule of Civil Procedure 56, Plaintiffs move this Court for an order granting partial summary judgment in their favor on the issue of liability on the defamation claim in Plaintiffs' Complaint. In the event the Court finds that summary judgment is appropriate on some but not all of the elements of plaintiffs' claim, then plaintiffs alternatively move for summary judgment with respect to those elements.

This Motion is supported by Plaintiffs' Memorandum in Support of Motion for Summary Judgment, the Declaration of Kevin D. Padrick submitted in support of this Motion, and the other pleadings and papers on file in this case.

DATED this 27th day of April 2011.

TONKON TORP LLP

By: /s/ David S. Aman

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT** on:

Crystal L. Cox
PO Box 505
Eureka, Montana 59917
Crystal @CrystalCox.com

- by mailing a copy thereof in a sealed, first-class postage prepaid envelope, addressed to said party's last-known address and depositing in the U.S. mail at Portland, Oregon on the date set forth below;
- by causing a copy thereof to be e-mailed to said party at her last-known email address on the date set forth below;

DATED this 27th day of April 2011

TONKON TORP LLP

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