# UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF WISCONSIN

ZAZA PACHULIA and TINATIN ALALIDZE,

Plaintiffs, Case No.: 16CV1531

v.

RANDY USOW ACCOUNTING, INC. and RANDY USOW,

Defendants.

# DEFENDANTS’ MOTION FOR PARTIAL SUMMARY JUDGMENT

Defendants, RANDY USOW and RANDY USOW ACCOUNTING, INC., by and through their attorneys, WILSON ELSER MOSKOWITZ EDELMAN & DICKER, LLP, hereby moves this Court to partially dismiss Plaintiffs’ claims pursuant to Federal Rule of Civil Procedure 56. Plaintiffs’ claims with respect to uncompleted federal audits and nonexistent state audits are not yet ripe for adjudication. As a result, such claims should be dismissed. This motion is further supported by the accompanying memorandum of law, Defendants’ statement of stipulated facts, Defendants’ statement of proposed material facts, and the Affidavit of Kevin A. Christensen and its exhibits, filed herewith.

Dated this 20th day of July, 2017

# WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP

Attorneys for Defendants, Randy Usow Accounting, Inc. and Randy Usow

# /s/ Kevin A. Christensen

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