

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA  
LLC, F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA  
DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484-BHL**

**DEFENDANT NETFLIX, INC.'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 56 and Civil Local Rules 7 and 56, Netflix, Inc. (“Netflix”), by and through undersigned counsel, moves the Court for an order granting summary judgment in its favor on all claims against it.

This Motion is supported by the accompanying Memorandum; the Declarations of Leita Walker (and its accompanying exhibits), Lisa Nishimura, Adam Del Deo, Paul Kopidlansky, Betty Heinzen, Kathleen Heinzen, Barbara Colborn, and Thomas Pankow; the parties’ stipulated statement of facts; Netflix’s statement of proposed material facts; the pleadings and records already on file with this Court; and any oral argument permitted by the Court on this motion.

Dated: September 16, 2022

Respectfully submitted,

*s/ Leita Walker*

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