

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

HEALTHCARE ADVOCATES, INC.,

Plaintiff,

v.

HARDING, EARLEY, FOLLMER &
FRAILEY; JOHN F.A. EARLEY, III,
CHARLES L. RIDDLE, FRANK J. BONINI,
JR., KIMBERLY TITUS, and JOHN DOES
1-5,

Defendants.

Civil Action No. 2:05-cv-03524-RK

Hon. Robert F. Kelly

MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff Health Care Advocates, Inc., by its undersigned attorneys, hereby moves the Court for Partial Summary Judgment in its favor and against Defendants Harding Early, Follmer & Frailey, John F. A. Earley, III, Charles L. Riddle, Frank J. Bonini, Jr., and Kimberly Titus on Counts I and III of the Second Amended Complaint. In support of this motion, plaintiff relies upon and incorporates the Declaration of Scott S. Christie, the Declaration of Kevin Flynn, plaintiff's Statement of Undisputed Material Facts, and the Memorandum of Law filed herewith.

Dated: February 26, 2007

By: /s/ Peter J. Boyer

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