UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

3D GLOBAL SOLUTIONS, INC.)	
, , , , , , , , , , , , , , , , , , ,	Civil Action No. 1:06-cv-722(GK)
ý	` ,
Plaintiff)	
v.)	
)	
MVM, INC.	
)	
Defendant)	
j	

PLAINTIFF 3D GLOBAL SOLUTIONS, INC.'S MOTION FOR SUMMARY JUDGMENT

Plaintiff, 3D Global Solutions, Inc., pursuant to Federal Rule of Civil

Procedure 56, moves this court for Summary Judgment against Defendant MVM,

Inc. In support, Plaintiff submits its accompanying Memorandum of Points and

Authorities and states the following but not limited reasons:

- 1. Plaintiff provided 230 TCN's to MVM pursuant to the parties contract that was in support of MVM's prime contract with the US Government.
- 2. MVM, Inc. hired and employed the TCN's provided pursuant to the contract between the parties.
- 3. Pursuant to the contract of the parties, MVM was to compensate Plaintiff's pre deployment services upon MVM's employment of the TCN's provided by Plaintiff.

- 4. Defendant received 3.5 million dollars pursuant to a settlement agreement with the US government which was to include MVM's settlement of Plaintiff's claims as a subcontractor.
- 5. Despite payment by the US government to settle claims, Defendant has failed to pay Plaintiff for the 230 TCN's provided.
- 6. Defendant's counterclaim for lost profits is foreclosed by the settlement agreement MVM executed with the U.S. Government.

Respectfully submitted,

____/s/____

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 5, 2008 a copy of the foregoing Plaintiff's Motion for Summary Judgment, was served electronically and by first class mail, postage prepaid upon:

Herbert S. Rosenblum Law Offices of Herbert S. Rosenblum 526 King St # 211 Alexandria, VA 22314 Attorney for Defendant

Athan T. Tsimpedes