

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

BARRETT GREEN

*

Plaintiff

*

Civil No.: 8:13-cv-01961-PJM

v.

*

PRO FOOTBALL, INC. d/b/a
THE WASHINGTON REDSKINS, *et al.*

*

Defendants

*

* * * * *

**DEFENDANT PRO-FOOTBALL, INC'S
MOTION TO DISMISS OR, IN THE ALERNATIVE,
MOTION FOR SUMMARY JUDGMENT**

Defendant Pro-Football, Inc. d/b/a The Washington Redskins, (hereinafter the “Redskins”) by its attorneys, FERGUSON, SCHETELICH & BALLEW, P.A., Robert L. Ferguson, Jr., and Craig F. Ballew, submits this Motion to Dismiss and supporting Memorandum of Law requesting that this Court dismiss all claims asserted against Defendant Redskins with prejudice and in support thereof states:

1. Plaintiff’s Complaint fails to state a cause of action upon which relief can be granted.
2. Plaintiff had knowledge of all the essential elements of his causes of action when he sustained an injury in the Giants v. Redskins game on December 5, 2004.
3. Plaintiff failed to file this lawsuit within 3 years of his injury and his claims are barred by the 3 year statute of limitations.

