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11 Attorneys for Defendant  
12 PACIFIC MARITIME ASSOCIATION

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 ERIC ALDAPE,  
16 Plaintiff,  
17 vs.  
18 INTERNATIONAL LONGSHORE  
19 AND WAREHOUSE UNION, et al.,  
20 Defendants.

Case No. 2:18-cv-00624 AB(SKx)

**NOTICE OF DEFENDANT  
PACIFIC MARITIME  
ASSOCIATION'S MOTION FOR  
SUMMARY JUDGMENT**

Date: August 16, 2019  
Time: 10:00 a.m.  
Judge: Hon. André Birotte Jr.  
Crt. Rm: 7B

1 TO PLAINTIFF ERIC ALDAPE AND HIS COUNSEL OF RECORD:  
 2 PLEASE TAKE NOTICE that at 10:00 a.m., on August 16, 2019, or as soon  
 3 thereafter as this matter can be heard in Courtroom 7B of the United States District  
 4 Court for the Central District of California, located at 350 West First Street, Los  
 5 Angeles, CA 90012, Defendant Pacific Maritime Association (“Defendant” or  
 6 “PMA”) will, and hereby does, move pursuant to Fed. R. Civ. P. 56 for summary  
 7 judgment on the grounds that no triable issue of material fact exists and that PMA  
 8 is entitled to judgment as a matter of law.

9 This motion is based upon the Notice of Motion and Motion, the supporting  
 10 Memorandum of Points and Authorities, Statement of Uncontroverted Facts and  
 11 Conclusions of Law, and the Declarations of Samson C. Huang, Todd C. Amidon  
 12 and Shanika Gunesequera, and all exhibits attached thereto, as well as the pleadings,  
 13 records and files in this case, and upon such other, further oral and documentary  
 14 evidence that may be presented at or before the hearing.

15 This motion is made following the conference of counsel pursuant to L.R. 7-  
 16 3 which took place on June 18, 2019.

17  
 18 Dated: June 28, 2019

MORGAN, LEWIS & BOCKIUS LLP

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 20 By           /s/ Samson C. Huang            
 21 Clifford D. Sethness  
 22 Samson C. Huang  
 23 Attorneys for Defendant  
 24 PACIFIC MARITIME  
 25 ASSOCIATION