

**IN THE CIRCUIT COURT OF JACKSON COUNTY,
MISSOURI AT KANSAS CITY**

FIRST CLUB MARKETING LLC;)	
)	
Plaintiff/Counterclaim Defendant;)	
)	
v.)	Case No. 1916-CV32558
)	
KANSAS CITY BARBEQUE SOCIETY)	Division: 11
)	
Defendant/Counterclaim Plaintiff/ Third Party Plaintiff/Counterclaim Defendant;)	
)	
v.)	
)	
RANDALL BOWMAN)	
)	
Third Party Defendant/Counterclaim Plaintiff)	

**FIRST CLUB MARKETING AND RANDALL BOWMAN'S
MOTION FOR SUMMARY JUDGMENT**

COMES NOW First Club Marketing LLC and Randall Bowman, pursuant to Missouri Supreme Court Rule 74.04, and hereby move the Court to enter summary judgment in its favor against Kansas City Barbeque Society.

In support of this Motion, Randall Bowman and First Club Marketing LLC incorporate by reference: *First Club Marketing LLC and Randall Bowman's Statement of Undisputed Material Facts* and *First Club Marketing LLC and Randall Bowman's Memorandum in Support of First Club Marketing LLC and Randall Bowman's Motion for Summary Judgment*, which are contemporaneously submitted herewith.

WHEREFORE, First Club Marketing LLC and Randall Bowman respectfully request an order from the Court granting First Club Marketing LLC and Randall Bowman's Motion for

Summary Judgment and granting such other relief as the Court deems just and equitable under the circumstances.

DATED: January 22, 2021

Respectfully Submitted,

WILLIAMS DIRKS DAMERON, LLC

/s/ Eric L. Dirks
Eric L. Dirks, MO Bar No. 54921
Michael Williams, MO Bar No.
47538 Courtney Stout, MO Bar No.
70375 1100 Main Street, Suite 2600

Kansas City, MO 64105
dirks@williamsdirks.com
mwilliams@williamsdirks.c
om
cstout@williamsdirks.com
Tel: (816) 945-7110
Fax: (816) 945-7118

*Attorneys for First Club Marketing LLC and
Randall Bowman*

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of January, 2021, a true and correct copy of the foregoing filed with the Clerk of the Court using the electronic filing system, which will send notice of electronic filing to all counsel of record for this case.

/s/ Eric L. Dirks
Eric L. Dirks