UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FEDERAL TRADE COMMISSION, STATE OF FLORIDA, OFFICE OF THE ATTORNEY GENERAL, DEPARTMENT OF LEGAL AFFAIRS, Plaintiffs, v. LIFEWATCH INC., a New York corporation, also d/b/a LIFEWATCH USA and MEDICAL ALARM SYSTEMS, SAFE HOME SECURITY, INC., a Connecticut corporation, MEDGUARD ALERT, INC., a Connecticut corporation, EVAN SIRLIN, individually and as an officer or manager of Lifewatch Inc., MITCHEL MAY, individually and as an officer or manager of Lifewatch Inc., and DAVID ROMAN, individually and as an officer or manager of Lifewatch Inc., Safe Home Security, Inc., and MedGuard Alert, Inc. Defendants.	Case No. 15-cv-5781 Judge Gary Feinerman

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants David Roman, Safe Home Security, Inc., and Med Guard Alert, Inc., by their attorneys, Swanson, Martin and Bell, LLP, move this Court for entry of an Order granting Defendants summary judgment on all counts, and in support thereof submits their Memorandum of Law in Support of their Motion for Summary Judgment and their Rule 56.1(a) Statement of Undisputed Facts.

WHEREFORE, Defendants David Roman, Safe Home Security, Inc., and Med Guard Alert, Inc., respectfully request that this Court grant their motion for summary judgment against Plaintiffs, the Federal Trade Commission and State of Florida, and for such other relief as this Court deems just and proper.

Respectfully submitted,

/s/ Joelle M. Shabat
Brian W. Bell, Esq.
Joelle M. Shabat, Esq.
Swanson, Martin & Bell, LLP
330 North Wabash Avenue, Suite 3300
Chicago, Illinois 60611
(312) 321-9100
bbell@smbtrials.com
jshabat@smbtrials.com
Attorneys for Safe Home Security, Inc.; MedGuard Alert, Inc.; and David Roman

Brian W. Bell, Esq. (ARDC #0160431)
Joelle M. Shabat, Esq. (ARDC #6313951)
Swanson, Martin & Bell, LLP
330 North Wabash Avenue, Suite 3300
Chicago, Illinois 60611
(312) 321-9100
(312) 321-0990 – Fax
bbell@smbtrials.com
jshabat@smbtrials.com