

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|---------------------------------|---|-----------------------|
| PIOTR NOWAK, | : | |
| | : | CIVIL ACTION |
| <i>Plaintiff</i> | : | |
| | : | No. 2:12-cv-04165-MAK |
| vs. | : | |
| | : | |
| PENNSYLVANIA PROFESSIONAL | : | |
| SOCER, LLC, and KEYSTONE SPORTS | : | |
| AND ENTERTAINMENT, LLC, | : | |
| | : | |
| <i>Defendants.</i> | : | |

ORDER

AND NOW, this _____ day of _____, 2016, upon

consideration of the Defendants' Cross-Motion to Confirm the AAA Arbitration Award and the response thereto, it is hereby ORDERED that the motion is DENIED. The AAA Arbitration Award is STRICKEN.

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EASTERN DISTRICT OF PENNSYLVANIA

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| PIOTR NOWAK, | : | |
| | : | CIVIL ACTION |
| <i>Plaintiff</i> | : | |
| | : | No. 2:12-cv-04165-MAK |
| vs. | : | |
| | : | |
| PENNSYLVANIA PROFESSIONAL | : | |
| SOCER, LLC, and KEYSTONE SPORTS | : | |
| AND ENTERTAINMENT, LLC, | : | |
| | : | |
| <i>Defendants.</i> | : | |

**PLAINTIFF, PIOTR NOWAK'S RESPONSE TO DEFENDANTS' CROSS-MOTION TO
CONFIRM THE AAA AWARD**

Plaintiff, Piotr Nowak, by and through his undersigned counsel, Haines & Associates, hereby submits this brief in reply to Defendants Pennsylvania Profession Soccer, LLC (“the Union”) and Keystone Sports’ Opposition to Nowak’s Motion to Vacate the AA Interim Award and in opposition to Defendants’ Cross-Motion to Confirm the AAA Final Award:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. This allegation references a writing, which says what it says.
9. This allegation references a writing, which says what it says.

10. This allegation references a writing, which says what it says.
11. This allegation references a writing, which says what it says.
12. This allegation references a writing, which says what it says.
13. This allegation references a writing, which says what it says.
14. This allegation references a writing, which says what it says.
15. This allegation references a writing, which says what it says.
16. This allegation references a writing, which says what it says.
17. This allegation references a writing, which says what it says.
18. This allegation references a writing, which says what it says.
19. Admitted in part and denied in part. Nowak admits that he has not remitted money to the Union, but denies the allegations in this paragraph to the extent that they infer or imply that this is wrongful. Nowak is moving to vacate the Award, and is therefore, not obligated to pay at this time.

20. Denied as a conclusion of law.
21. Denied as a conclusion of law.
22. Denied as a conclusion of law.

WHEREFORE, for reasons set forth at length in Nowak's Motion to Vacate and the accompanying Reply Brief in response to the Union's Opposition to Nowak's Motion to Vacate, Piotr Nowak respectfully requests that the Honorable Court vacate the AAA Arbitration Award.

Respectfully submitted,

HAINES & ASSOCIATES

By: /s/ Clifford E. Haines
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Dated: January 5, 2016