

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 1:15-cv-13297-NMG

BHARANIDHARAN PADMANABHAN MD PhD )  
(Dr. Bharani) )  
- PLAINTIFF )

vs. )

MAURA HEALEY )  
STEVEN HOFFMAN )  
CHRIS CECCHINI )  
ADELE AUDET )  
JAMES PAIKOS )  
LORETTA KISH COOKE )  
JOHN DOES )  
JANE DOES )  
- DEFENDANTS )

JURY TRIAL DEMANDED

22 October 2015

FILED  
IN CLERK'S OFFICE  
OCT 22 PM 12:17  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

MOTION FOR ENTRY OF DEFAULT  
AGAINST DEFENDANT JANE DOE

- 1 Plaintiff filed his complaint, pro se, with this Court on the 30th of September, 2015.
- 2 On the 1st of October, 2015, the Office of the Attorney General properly accepted service of the summons and complaint on behalf of DEFENDANT JANE DOE.
- 3 Despite a legal requirement, DEFENDANT JANE DOE had refused to identify herself on the 29th of April, 2015, despite being politely asked, when she accompanied Defendant Chris Cecchini to Plaintiff's home as an official agent of Defendant Attorney General Maura Healey.
- 4 The level of lawlessness within the Office of Attorney General Maura Healey that was laid out with particularity in the complaint has continued and extends to the continued

*Motion denied. JBM/Goston, USDJ 11/20/15*