

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 )

FILED  
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 U.S. DISTRICT COURT  
 DISTRICT OF MASS.

MOTION FOR EXPEDITED REVIEW

Here comes Plaintiff Dr. Bharani and respectfully requests expedited review of the various motions pending before this Court for the following reasons:

- 1 Plaintiff Dr. Bharani filed suit and moved this honorable Court in order to bring an end to ongoing harms against him as a direct consequence of Defendants' conscious violations of 28 U.S.C. § 1030 ("CFAA") and 105 CMR 700.012.
- 2 Where this Court has not ruled against the Defendants' consciously fraudulent motion to dismiss and numerous other pending motions, Plaintiff Dr. Bharani is being denied justice and continues to suffer significant harm.
- 3 Declaring that Defendant AG Maura Healey, her Office and the Defendants violated federal law and do not care about patient privacy is a matter fully in the public interest.
- 4 This past week Defendant AG Maura Healey and her Office have been decisively and publicly declared by the Massachusetts Superior Court to not care about the safety of

children. (Suffolk, Docket 15-CV-1370-B, Curran, J.)

5 Ruling against Defendant AG Maura Healey's motion to dismiss, the Superior Court wrote "if the relief granted in this case means that other little children, raped by their state-employed caregivers, to whom parents have entrusted their loves of their lives, will find out the hideous details of an alleged cover-up of their children's rape, then let justice prevail."

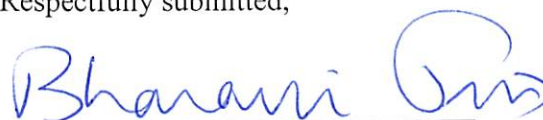
6 The Court also declared "Who speaks for the children of this case. Not the Attorney General's office, charged with protecting the public safety[.]"

7 In this instant case too it is undoubtedly in the public interest for the people of this Commonwealth to be informed that Defendant Attorney General Maura Healey and her Office evidenced total contempt for their cherished and officially-protected privacy rights and for the rule of law. "Sunshine is the best disinfectant" said Judge Curran quoting in turn the great Judge Brandeis.

8 Delay in progress of this case harms not only Plaintiff Dr. Bharani and his sixteen patients but all the citizens of Massachusetts.

For the foregoing reasons, Plaintiff Dr. Bharani respectfully requests expedited review of all pending motions, denial of Defendants' motion to dismiss, and speedy scheduling of a conference to proceed with discovery, default judgement or preparations for trial.

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

*pro se*

30 Gardner Road #6A, Brookline MA 02445

617 5666047 [scleroplex@gmail.com](mailto:scleroplex@gmail.com)

1 February 2016

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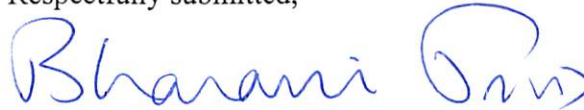
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CERTIFICATE OF COMPLIANCE WITH L.R. 7.1

CERTIFICATE OF SERVICE

- 1 Plaintiff Dr. Bharani, pro se, certifies that he has conferred with Co-counsel Adam LaGrassa over this motion and has not received either an assent or an opposition, despite one month's notice. Email attached.
- 2 Plaintiff Dr. Bharani served a copy of this motion via Certified Mail on Defendants via their Co-counsel Adam LaGrassa at AGO. Tracking # 7015 1520 0003 0362 8724

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

*pro se*

30 Gardner Road #6A, Brookline MA 02445

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1 February 2016



BP BP &lt;scleroplex@gmail.com&gt;

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**email to confer re Motion for Expedited Review re 15-cv-13297-NMG**

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**scleroplex** <scleroplex@gmail.com>

Mon, Feb 1, 2016 at 5:37 PM


To: "LaGrassa, Adam (AGO)" &lt;adam.lagrassa@state.ma.us&gt;

Dear Adam,  
Please find attached the motion for expedited review.  
If you assent please email me in the morning.  
Thanks!  
Bharani

On **Thu, Dec 3, 2015 at 1:12 PM**, scleroplex <scleroplex@gmail.com> wrote:

Dear Adam,  
Greetings.  
I am in the process of writing a motion to request the court for expedited review of all the pending motions.  
I expect you would have no objection.  
Please let me know your thoughts.  
I anticipate filing it tomorrow.  
Shall email you again when I am done.  
Bharani

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