

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

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

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

JURY TRIAL DEMANDED

vs. )

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

U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

2015 NOV 16 PM 9 08

FILED  
IN CLERK'S OFFICE

16 November 2015

MOTION FOR ENTRY OF DEFAULT  
AGAINST DEFENDANTS HEALEY, HOFFMAN, CECCHINI,  
PAIKOS, COOKE AND AUDET

1 The Defendants named above were originally required to Answer the Complaint against them by October 21st, 2015.

2 The Defendants named above committed a fraud on this Court to get the deadline extended to November 15th, 2015, as amply documented in Plaintiff's Motion for Sanctions (Document #22).

3 This Court granted Defendants' own Motion and clearly ordered - "Adele Audet Answer due by 11/15/2015; Chris Cecchini Answer due by 11/15/2015; Loretta Kish Cooke

**Answer due by 11/15/2015; Maura Healey Answer due by 11/15/2015; Steven Hoffman Answer due by 11/15/2015; James Paikos Answer due by 11/15/2015.”**

4 Per this Court’s Local Rules (2015) Defendants’ Answer was due by November 15th, 2015, by 6pm.

5 As the AGO files all documents electronically it had every opportunity and obligation to do so electronically by 6pm on November 15th, 2015, a deadline selected by the Defendants themselves. Alternatively it should have filed by the close of business on November 13th, 2015.

6 Defendants’ Counsel Mark Sutliff has literally had four (4) full weeks to work on their Answer, including two (2) full weeks after returning from his second vacation of 2015.

7 Since being served the Complaint, the Defendants have had total forty-five (45) days to file an Answer with this Court. They have chosen to not file an Answer within 45 days.

8 Despite selecting the deadline date by themselves and committing a conscious fraud on this Court to get their self-selected deadline approved, the Defendants named above still have not filed their required Answer by their own self-selected deadline.

9 Once again the Defendants have demonstrated their total contempt for this Court and the rule of law. Defendants continue to act as if they are above the law.

10 Plaintiff Dr Bharani has already documented to this Court the utter lawlessness obtaining within the Office of Defendant Attorney General Maura Healey, one more example being this current conscious disregard for this Court-ordered deadline.

9 Plaintiff Dr Bharani has already been irreparably harmed by the actions of Defendants and continues to be harmed by Defendants' repeated ongoing contempt for the rules and procedures of this Honorable Court.

10 This Court should summarily reject all excuses put forth in the future by Defendants as to why they consciously ignored their own requested extended deadline.

Wherefore Plaintiff respectfully requests that

- a) an ORDER of DEFAULT be immediately entered against Defendant Maura Healey, Defendant Steven Hoffman, Defendant Chris Cecchini, Defendant James Paikos, Defendant Loretta Kish Cooke and Defendant Adele Audet for willfully ignoring the new deadline kindly extended to them by this Court; and that
- b) an ORDER be entered for a timely hearing so Plaintiff Dr Bharani is not further harmed and proceedings may unfold towards a default judgement soon.

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

*pro se*

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JURY TRIAL DEMANDED

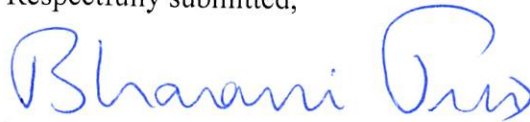
vs. )

MAURA HEALEY )  
STEVEN HOFFMAN )  
CHRIS CECCHINI )  
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JANE DOES )  
- DEFENDANTS )

CERTIFICATE OF COMPLIANCE WITH RULE 7.1

- 1 Plaintiff conferred with AAG Adam LaGrassa and sent him a copy of the Motion for Default via email for review. Attachment 1
- 2 Plaintiff also sent a copy of the Motion for Default to AAG Adam LaGrassa by Certified Mail. \_\_\_\_\_
- 3 Plaintiff and Counsel for certain named Defendants have been unable to resolve this issue out of court. Plaintiff has not heard back from AGO.
- 4 In fact Plaintiff still has not heard back from AGO from the time of the first attempt prior to filing the Motion for Sanctions. The signed postal receipt is in hand.

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

*pro se*

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16 November 2015

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Gmail - email to confer per Rule 7.1 for 1:15-cv-13297-NMG

15/11/15 18:36



BP BP <scleroplex@gmail.com>

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**email to confer per Rule 7.1 for 1:15-cv-13297-NMG**

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**scleroplex** <scleroplex@gmail.com>  
To: adam.lagrassa@state.ma.us

Sun, Nov 15, 2015 at 6:34 PM

Dear Adam,

Please find attached the Motion for entry of default that I intend to file.

As of 6pm today your clients are in default for refusing to answer by even the extended deadline.

And per the Court the ECF system is fully functional and not down for maintenance.

Ethically I am precluded from communicating directly with Mark Sutliff hence my emails to you.

Regards,  
Bharani

**Bharani Padmanabhan MD PhD**  
*Board-certified Double-Fellowship-trained MS expert*

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 **MOTION ENTRY DEFAULT HEALEY print.pdf**  
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