

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 )

22 October 2015

U.S. DISTRICT COURT  
DISTRICT OF MASS.

2015 OCT 22 PM 12:47

FILED  
IN CLERKS OFFICE

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

refusal of her Office to identify DEFENDANT JANE DOE or seek an extension of time to answer the complaint.

- 5 The Office of Defendant Attorney General Maura Healey has 500 attorneys who are all fully aware of the law and routine court procedure.

Wherefore Plaintiff respectfully requests that

- a) an order of default be entered against DEFENDANT JANE DOE; and that
- b) the Office of the Attorney General be ordered by this Court to reveal the identity of DEFENDANT JANE DOE so further default proceedings may unfold.

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

pro se

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CERTIFICATE OF COMPLIANCE WITH RULE 7.1

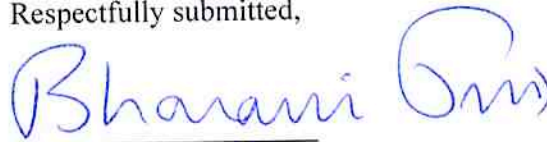
- 1 Plaintiff was informed that Assistant Attorney General Mark Sutliff has been assigned to represent the Defendants in this case.
- 2 AAG Sutliff already also represents Defendants in a different civil action brought by Plaintiff.
- 3 Plaintiff is represented by Counsel in that earlier lawsuit.
- 4 Plaintiff is thus precluded from direct communications with AAG Sutliff as they would be considered ex-parte communications.
- 5 In order to comply with the requirement to confer under Local Rule 7.1, Plaintiff sent his Motion for Entry of Default to the AGO by fax on October 21st, 2015 without specifically addressing it to AAG Sutliff so as to also not run foul of the prohibition on

ex-parte communications and with a cover letter clearly explaining this circumstance.

Plaintiff also sent a copy by Certified First Class Mail on the same day.

6 Plaintiff has not received a response from the AGO.

Respectfully submitted,



Bharanidharan Padmanabhan MD PhD

pro se

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21 October 2015

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

TO WHOM IT MAY CONCERN  
Letter to Confer per Local Rule 7.1

Dear Attorney,

As conferring with AAG Mark Sutliff would be *ex-parte* communication I am precluded from communicating with him directly.

Please find attached my Motion to the Court which I am faxing over to the AGO to comply with Local Rule 7.1.

Yours sincerely,



Bharani Padmanabhan MD PhD  
Board-certified Double-Fellowship-trained

Total 3 pages.

To: 6177274765  
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