UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

)
JEAN BATTY; EDWARD RUSSO; MARY LEARNING; KEN TRUDELL; MATT WOLF; PAUL P. BARNETT; CRAIG VACCA; DAVID GOLDMAN; JANELLE GOLDMAN; and COMMONWEALTH SECOND AMENDMENT, INC.,	C.A. 15-10238-FDS)))))
Plaintiffs)
)
V.)
)
KEN ALBERTELLI, in his Official Capacity as)
Chief of the Winchester Police Department;)
RICHARD C. GRIMES, in his Official Capacity as)
Chief of the Weymouth Police Department;)
WILLIAM TAYLOR, in his Official Capacity as)
Superintendent of the Lowell Police Department;)
and DAVID A. PROVENCHER, in his Official)
Capacity as Chief of the New Bedford Police)
Department,)
Defendants	,)
	,)
	-/

ASSENTED-TO MOTION OF THE DEFENDANT, WILLIAM TAYLOR, TO STAY THIS ACTION AS TO HIM, IN HIS OFFICIAL CAPACITY AS SUPERINTENDENT OF THE LOWELL POLICE DEPARTMENT

Defendant, William Taylor, Superintendent of the Lowell Police Department ("Lowell"), hereby respectfully moves this Honorable Court, with Plaintiffs' consent, to stay this action in its entirety as to Lowell for a period of four weeks or until a conference is scheduled in this matter pursuant to Fed. R. Civ. P. 16(b) and L. R. 16.1, whichever is sooner. In support of this Motion, Lowell relies upon its accompanying Memorandum of Law in Support of Lowell's Motion to Stay, filed herewith and incorporated herein by reference in its entirety.

WHEREFORE, Lowell respectfully requests that this Honorable Court:

Enter a stay of this action as to William Taylor, Superintendent of the Lowell Police Department, for a period of four weeks or until a conference is scheduled in this matter pursuant to Fed. R. Civ. P. 16(b) and L. R. 16.1, whichever is sooner.

Continue the hearing in this matter that is currently scheduled for September 17, 2015 on Lowell's Motion to Stay this Action Under the Doctrine of Pullman Abstention and to Enlarge Lowell's Time to Respond to the Amended Complaint.

September 16, 2015

Respectfully submitted, DEFENDANT, WILLIAM TAYLOR, SUPERINTENDENT, LOWELL POLICE DEPARTMENT

/s/ Rachel M. Brown_

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Assented to by:

THE PLAINTIFFS, By their attorneys,

/s/ David D. Jensen

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was filed through the Electronic Case Filing System for filing and electronic service to the registered participants as identified on the Notice of Electronic Filing on September 16, 2015.

/s/ Rachel M. Brown
Rachel M. Brown, Assistant City Solicitor