

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN CIVIL LIBERTIES UNION OF
MASSACHUSETTS, INC.,

Plaintiff,

v.

PLYMOUTH COUNTY SHERIFF'S
DEPARTMENT,

Defendant.

No. 1:26-CV-14149-LTS

ORAL ARGUMENT REQUESTED

PLAINTIFF'S MOTION TO REMAND

Plaintiff American Civil Liberties Union of Massachusetts, Inc. hereby moves this Court pursuant to 28 U.S.C. § 1447(c) to remand this case to the Suffolk Superior Court. In support of this motion, Plaintiff relies upon its Memorandum of Law, the Declaration of Daniel L. McFadden, and the pleadings and papers on file with the Court.

Pursuant to Local Rule 7.1(d), Plaintiff respectfully requests oral argument on the motion, which Plaintiff believes will assist the Court in resolving the issues raised by this motion.

Respectfully submitted,

AMERICAN CIVIL LIBERTIES UNION
OF MASSACHUSETTS, INC.

By its attorneys,

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Dated: October 7, 2026

LOCAL RULE 7.1(a)(2) CERTIFICATE

I hereby certify pursuant to Local Rule 7.1(a)(2) that Plaintiff conferred with the United States in a good faith attempt to narrow or resolve the issues presented by this motion, but the parties were unable to reach an agreement.

Dated: October 7, 2026

/s/ Andrew J. O'Connor

Andrew J. O'Connor

CERTIFICATE OF SERVICE

I hereby certify that on October 7, 2026, this document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: October 7, 2026

/s/ Andrew J. O'Connor

Andrew J. O'Connor