

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT  
CIVIL ACTION  
DOCKET NO. 2084CV01035

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AMERICAN CIVIL LIBERTIES UNION OF )  
MASSACHUSETTS, INC., )  
) )  
Plaintiff, )  
v. )  
) )  
BRISTOL COUNTY SHERIFF’S OFFICE, )  
) )  
Defendant. )

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**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Rule 56 of the Massachusetts Rules of Civil Procedure, Plaintiff American Civil Liberties Union of Massachusetts hereby moves this Court to grant summary judgment in Plaintiff’s favor.

In support of this Motion, the Plaintiff files herewith Plaintiff’s Combined Memorandum in Support of Disclosure of Public Records and Motion for Summary Judgment, Plaintiff’s Statement of Material Facts in Support of Plaintiff’s Motion for Summary Judgment, and supporting affidavit and exhibits.

**REQUEST FOR ORAL ARGUMENT**

Plaintiff respectfully requests oral argument as it may aid the Court in ruling on this Motion.

December 22, 2021

Respectfully submitted,

Christopher E. Hart  
Christopher E. Hart (BBO # 625031)  
Stephen K. Garvey (BBO # 707205)  
Foley Hoag LLP  
155 Seaport Blvd  
Boston, MA 02110  
(617) 832-1000  
chart@foleyhoag.com  
sgarvey@foleyhoag.com

Matthew R. Segal (BBO# 654489)  
Daniel L. McFadden (BBO# 676612)  
American Civil Liberties Union  
Foundation of Massachusetts, Inc.  
211 Congress Street  
Boston, MA 02110  
(617) 482-3170

*Attorneys for Plaintiff*

**CERTIFICATE PURUANT TO SUPERIOR COURT RULE 9C**

I hereby certify that, on December 17, 2021, I conferred with counsel for the Defendant, Lorraine Rousseau and Robert Novack, in by telephone and over email in an effort to resolve or narrow the issues in this dispute. The parties were unable to resolve or narrow the dispute during those communications.

/s/ Christopher E. Hart  
Christopher E. Hart

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22nd day of December, 2021, the foregoing document was served on counsel for Defendant at:

Lorraine J. Rousseau, Esq.  
Bristol County Sheriff's Office  
400 Faunce Corner Road  
North Dartmouth, MA 02747  
lorrainerousseau@bcso-ma.org

/s/ Stephen K. Garvey  
Stephen K. Garvey