

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MAURA O'NEILL, as administrator)
Of the Estate of Madelyn E. Linsenmeir,)
Plaintiff,)
v.)
)
CITY OF SPRINGFIELD, MOISES)
ZANAZANIAN, REMINGTON MCNABB,)
SHEILA RODRIGUEZ, HAMPDEN)
COUNTY SHERIFF'S DEPARTMENT,)
And JOHN/JANE DOES NOS. 1-5,)
Defendants)
)

Civil Action No.: 3:20-cv-30036

**DEFENDANTS', CITY OF SPRINGFIELD, SHEILA RODRIGUEZ, MOISES
ZANAZANIAN and REMINGTON MCNABB, MOTION FOR SUMMARY JUDGMENT**

Now come the Defendants, City of Springfield, Sheila Rodriguez, Moises Zanazanian and Remington McNabb ("Municipal Defendants") and respectfully move this Honorable Court enter summary judgment in their favor pursuant to F.R.Civ.P. 56 on all Counts directed to them, i.e. Counts I and Count IV. Municipal Defendants state that they are entitled to judgment as a matter of law based on the undisputed material facts. In support, the Municipal Defendants submit their memorandum of law and statement of undisputed facts with exhibits.

REQUEST FOR ORAL ARGUMENT

Municipal Defendants respectfully request, pursuant to L.R. 7.1(4)(d), that a hearing for oral argument be scheduled in this matter.

L.R. 7.1 (A)(2) CERTIFICATION

The undersigned hereby certify that they have advised Plaintiffs' counsel of the filing of this motion, via email and telephone.

Respectfully submitted,
Defendants, City of Springfield and
Sheila Rodriguez, by their attorneys,

Dated: December 21, 2023

/s/ Lisa C. deSousa

Lisa C. deSousa, Esq. BBO #546115
City of Springfield Law Department
1600 E. Columbus Ave., 2nd Floor
Springfield, MA 01103
Tel: (413) 886-5205
ldesousa@springfieldcityhall.com

Defendant Moises Zanazanian,
by his attorney,

/s/ John K. Vigliotti

John K. Vigliotti, Esq. BBO #642337
Reardon, Joyce & Akerson, P.C.
4 Lancaster Terrace
Worcester, MA 01609
Tel: (508) 754-7284
jvigliotti@rja-law.com

Defendant, Remington McNabb,
by his attorney,

/s/ Kevin B. Coyle

Kevin B. Coyle, Esq. BBO #103540

1299 Page Boulevard

Springfield, MA 01104

Tel: (413) 787-1524

attycoyle@aol.com

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true copy of the within was this day served upon the parties via the Federal Court's ECF Notice and Delivery System. I am not aware of any party who is a non-registered participant, and therefore electronic filing is the sole means of service of this document.

Signed under the pains and penalties of perjury.

Dated: December 21, 2023

/s/ Lisa C. deSousa

Lisa C. deSousa, Esq.