

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS,

Plaintiff

v.

NORTHEASTERN MASSACHUSETTS LAW
ENFORCEMENT COUNCIL, INC.,

Defendant

Civ. A. No. 2014-02035-G

RECEIVED

JUN 15 2015

SUPERIOR COURT-CIVIL
MICHAEL JOSEPH DONOVAN
CLERK/MAGISTRATE

JOINT MOTION FOR ENTRY OF JUDGMENT

Pursuant to Massachusetts Rule of Civil Procedure 58(a)(2), plaintiff American Civil Liberties Union Foundation of Massachusetts (ACLU) and defendant Northeastern Massachusetts Law Enforcement Council, Inc. (NEMLEC) jointly move this Court to enter judgment in the form of the Proposed Form of Judgment attached hereto as Attachment A.

NORTHEASTERN MASSACHUSETTS
LAW ENFORCEMENT COUNCIL, INC.

AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS

By its attorney,

By its attorneys,

Carl Valvo /CR (w/permission)

Jessie J. Rossman

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Laura Rótolo, BBO No. 665247
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Foundation of Massachusetts
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Boston, MA 02110
(617) 482-3170 ex. 337
jrossman@aclum.org

DATED: June 15, 2015

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT

_____)
 AMERICAN CIVIL LIBERTIES UNION)
 FOUNDATION OF MASSACHUSETTS,)
)
 Plaintiff,)
)
 v.)
)
 NORTHEASTERN MASSACHUSETTS)
 LAW ENFORCEMENT COUNCIL, INC.,)
)
 Defendant.)
 _____)

Civ. No. 2014-02035-G

PROPOSED FORM OF JUDGMENT

Plaintiff American Civil Liberties Union Foundation of Massachusetts (ACLUM) and defendant Northeastern Massachusetts Law Enforcement Council, Inc. (NEMLEC) hereby agree that the final and complete judgment for this action may be entered as follows:

1. Upon agreement of the parties, it is hereby declared as follows:

NEMLEC is an entity whose records are subject to the Massachusetts Public Records Law, comprised of G.L. c. 4, § 7, *Twenty-sixth*, and G.L. c. 66 § 10.

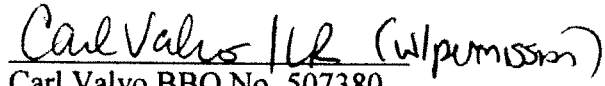
2. Count II is dismissed as moot in light of the parties' agreement on Count I and in light of NEMLEC's provision to ACLUM of documents sought in the public records request underlying this matter.

3. Each party shall bear its own costs.

[signatures on the following page]

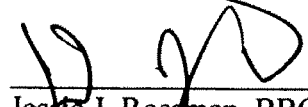
**NORTHEASTERN MASSACHUSETTS
LAW ENFORCEMENT COUNCIL, INC.**

By its attorney,


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**AMERICAN CIVIL LIBERTIES UNION
FOUNDATION OF MASSACHUSETTS**

By its attorneys,


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American Civil Liberties Union
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211 Congress Street
Boston, MA 02110
(617) 482-3170 ex. 337
jrossman@aclum.org

DATED: June 15, 2015

IT IS SO ORDERED AND ENTERED:

DATE: June __, 2015

HON. _____

Judge Robert Ullmann