

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
JOHN DOE,)	
)	
Plaintiff,)	
)	
v.)	
)	Civil Action No. 17-cv-40151-TSH
JOHNSON & WALES UNIVERSITY,)	
)	
Defendant)	
_____)	

PLAINTIFF’S MOTION TO PROCEED UNDER PSEUDONYM

The Plaintiff, by counsel, respectfully moves that this Honorable Court allow him to proceed in this action under the pseudonym John Doe. In support of this motion, Plaintiff states that through this action Plaintiff seeks to remedy harms imposed due to the Defendant’s conduct in wrongfully proclaiming him a sexual assailant and that further disclosure of his identity would only magnify the harm he has already suffered. Plaintiff further relies upon the memorandum of law submitted herewith. ¹

WHEREFORE, the Plaintiff respectfully requests that the Court allow this motion and issue the Proposed Order attached hereto as Exhibit A.

¹ In addition to filing the complaint under the pseudonym John Doe through ECF, the Plaintiff is filing a complaint revealing his identity under seal directly with the Court. The Defendant knows the identity of Plaintiff via pre-litigation communications.

Respectfully submitted,
John Doe,
By his attorney,

/s/ James P. Ehrhard
James P. Ehrhard, Esq., BBO #651797
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Dated: December 18, 2017

CERTIFICATE OF SERVICE

I, James P. Ehrhard, hereby certify that I served the above Motion to the following parties on today's date via U.S. Mail postage prepaid if not noted as having received copies via ECF:

Jeffrey S. Brenner, Esq., VIA ECF

Steven M. Richard, Esq., VIA ECF

/s/ James P. Ehrhard
James P. Ehrhard, Esq.

Dated: December 18, 2017

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**[PROPOSED] ORDER ON PLAINTIFF’S
MOTION TO PROCEED UNDER PSEUDONYM**

Following review of this matter, the Court hereby orders that the Plaintiff’s Motion to Proceed Under Pseudonym is granted, and Plaintiff shall be permitted to proceed under the pseudonym “John Doe” in all public filings in this matter.

Dated: _____