

SUFFOLK, SS

SUFFOLK SUPERIOR COURT
CIVIL ACTION NO.

19-1308-14

John Doe 1 and John Doe 2
PLAINTIFF (Print Name Clearly)

VS

Robert Manning et al
DEFENDANT (Print Name Clearly)

PLAINTIFFS'
MOTION TO PROCEED
UNDER A PSEUDONYM

MOTION

Now comes the plaintiff/defendant

and moves this Honorable Court to enter an order allowing them to proceed anonymously in this matter. Plaintiffs rely on the facts in the verified complaint. As alleged there, they are Jewish students on the campus of the University of MA Amherst who, because of the rising anti-semitism they are experiencing from peers and from faculty, fear for their safety and fear retaliation in the form of bad grades, refusals to give them recommendations and myriad other subtle actions. The anti-semitism on campus has been documented online, for instance: <https://www.masslive.com/news/2017/01/umass-ranked-26th-worst-campus.html>

Dated this _____ day of _____

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Respectfully submitted
Karen Hurvitz
Signature

April 25, 2019