

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
JANE DOE,)	
Plaintiff,)	
)	
v.)	C.A. NO. 17-12255-RGS
)	
MASSACHUSETTS DEPARTMENT)	
OF CORRECTION, et al.,)	
Defendants.)	
_____)	

DEFENDANTS’ MOTION TO DISMISS

Defendants, Massachusetts Department of Correction (“DOC”), Thomas A Turco III, Sean Medeiros, Stephanie Collins, and James M. O’Gara, through counsel, hereby move this Court to dismiss plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(6).

In support of this motion, defendants submit the attached memorandum of law.

Dated: January 5, 2018

Respectfully submitted,

NANCY ANKERS WHITE
Special Assistant Attorney General

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CERTIFICATE OF SERVICE

I, Richard C. McFarland, counsel for defendants, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on 01/05/18.

/s/ Richard C. McFarland

Richard C. McFarland