

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT  
Civil Action No.: 2484CV01197

Government Accountability & Oversight,	)
	)
Plaintiff,	)
	)
v.	)
	)
OFFICE OF THE ATTORNEY GENERAL OF	)
MASSACHUSETTS, ANDREA CAMPBELL, in	)
her official capacity as Attorney General, et al.,	)
	)
	)
Defendants.	)

MOTION FOR DISCOVERY TO OBTAIN SUFFICIENT INFORMATION TO BRIEF  
SUMMARY JUDGMENT MOTIONS

Pursuant to Superior Court Rule 9A and Mass. R. Civ. P. 16, Plaintiff, Government Accountability & Oversight (“GAO”), respectfully submits this motion moving the Court to grant attorney’s eyes-only discovery of the two remaining disputed records in this Public Records Law action such that Plaintiff may obtain sufficient information to brief its summary judgment motion. In support of this motion, GAO submits herewith a supporting memorandum of law, proposed orders and a declaration from Nathaniel M. Lindzen.

Dated: August 9, 2024

Respectfully Submitted  
Government Accountability & Oversight  
By its attorney,

/s/ Nathaniel M. Lindzen  
Nathaniel M. Lindzen (BBO #689999)  
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Certificate of Service

I, Nathaniel M. Lindzen, attorney for Plaintiff, Government Accountability & Oversight, hereby certify that on August 9, 2024, I served the foregoing, electronically by email on:

Angelica Duron, Esq.  
Office of Massachusetts Attorney General  
One Ashburton Place  
Boston, MA 02108

Dated: August 9, 2024

/s/ Nathaniel M. Lindzen