

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CA NO. 1:11-CV-11997-JGD

MARIA BARBOSA, HENRIQUETA BARBOSA,
MANUEL BARBOSA and ANGELA BARBOSA,
Plaintiffs,

Vs.

WILLIAM K. CONLON IN HIS CAPACITY AS CHIEF OF
POLICE FOR CITY OF BROCKTON, MA, THOMAS
HYLAND, BRYAN MAKER, JESSE DRANE
KENNETH LOFSTRUM, BRYAN DONAHUE,
STEVEN E. JOHNSON, MARK CELIA,
MICHAEL DUBE, FRANK BAEZ,
ANTHONY GIARDINI, EMANUEL GOMES
LEON MCCABE AND JOHN DOE 1-3
Defendants

**DEFENDANTS WILLIAM CONLON, THOMAS HYLAND, BRYAN MAKER, JESSE
DRANE, KENNETH LOFSTROM, BRIAN DONAHUE, STEVE JOHNSON, MARK
CELIA, MICHAEL DUBE, FRANK BAEZ, ANTHONY GIARDINI, EMANUEL GOMES
AND LEON MCCABE'S MOTION FOR SUMMARY JUDGMENT
PURSUANT TO FED.R.CIV.P. 56(C)**

Now comes the Defendants, William Conlon, Thomas Hyland, Bryan Donahue, Steven
E. Johnson, Mark Celia, Michael Dube, Frank Baez, Anthony Giardini, Emanuel Gomes and
Leon McCabe, and hereby move this Honorable Court to allow their Motion for Summary
Judgment pursuant to Fed.R.Civ.P. 56(c) as there are no disputed material facts and they are
entitled to judgment as a matter of law.

Defendants,
By their Attorney,
/s/Stephen C. Pfaff

Stephen C. Pfaff BBO# 553057
Louison, Costello, Condon & Plaff, LLP
101 Summer Street
Boston, MA 02110
(617) 439-0305
spfaff@lccplaw.com

CERTIFICATE OF SERVICE

I, Stephen C. Pfaff, hereby certify that on the 1st day of March, 2013, I served the foregoing electronically to the following:

Charles P. Kazarian, Esq.
Law Office of Charles P. Kazarian
160 State Street, Sixth Floor
Boston, MA 02109

/s/Stephen C. Pfaff

Stephen C. Pfaff