

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

DOCKET NO. 16-cv-11865-GAO

FRANCISCO BAEZ,

Plaintiff

v.

THE CITY OF BROCKTON POLICE
DEPARTMENT; GEORGE KHOURY;
EMANUEL GOMES; and
WAYNE SARGO,

Defendants

DEFENDANT CITY OF BROCKTON
POLICE DEPARTMENT'S MOTION TO DISMISS
PURSUANT TO F.R.C.P. 12(b)(6)

Now comes the Defendant, the City of Brockton Police Department and respectfully
moves this Court to dismiss all the counts against it in Plaintiff's Complaint pursuant to F.R.C.P.
12(b)(6) per the attached Memorandum of Law

Defendant, City of Brockton Police Department,

By its Attorney,

/s/Stephen C. Pfaff

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CERTIFICATE OF SERVICE

I, Stephen C. Pfaff, hereby certify that on the 13th day of October, 2016, I served the foregoing by causing a copy to be directed electronically or via e-mail/first class mail, postage prepaid to:

Kevin Powers, Esq.
Rodgers, Powers & Schwartz LLP
111 Devonshire Street
Boston, MA 02109

/s/Stephen C. Pfaff

Stephen C. Pfaff