

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

_____	)	
Emmanuel Andro,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 15-13030-NMG
	)	LEAVE TO FILE GRANTED 6/1/16
Town of Brookline, et al.,	)	
	)	
Defendants.	)	
_____	)	

**DEFENDANT TOWN OF BROOKLINE'S MOTION TO DISMISS**

As more fully demonstrated in the accompanying Memorandum in Support, the Defendants Town of Brookline, Daniel C. O'Leary, Russell T. Lloyd, Ilya D. Gruber, Michael John McCarthy, Joseph Capuccio, Doreen Gallagher, Paul Campbell, Jennifer Paster and Ray Richards, by their attorney, Jonathan Simpson, Associate Town Counsel, respectfully request that this Court dismiss the claims filed against said Defendants pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6).

Respectfully submitted,

/s/ Jonathan Simpson  
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Date: June 30, 2016

LOCAL RULE 7.1 CERTIFICATION

Pursuant to this Court's Order dated June 2, 2016, the undersigned counsel was granted leave to file the foregoing motion and related documents without first conferring with the plaintiff in this matter.

/s/ Jonathan Simpson

Jonathan Simpson

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2016, this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and a paper copy will be sent to the plaintiff at the following address:

Emmanuel Andro, pro se  
1764 Dorchester Avenue, #2  
Boston, MA 02124  
(617) 596-1614

/s/ Jonathan Simpson

Jonathan Simpson