

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO: 2181CV01458

Malden Public Schools,

Plaintiff,

v.

Rebecca S. Murray, Supervisor of Records
of the Public Records Division of the Office of
William Francis Galvin, Secretary of the
Commonwealth and William Francis Galvin,
Secretary of the Commonwealth and
Bruce Friedman,

Defendants.

**PLAINTIFF MALDEN PUBLIC SCHOOL'S EMERGENCY MOTION FOR LEAVE TO
FILE AN AMENDED COMPLAINT**

NOW COMES Plaintiff Malden Public Schools (hereinafter "Malden"), pursuant to Mass. R. Civ. P. 15(a), and respectfully requests that this Honorable Court grant leave to Malden to file an Amended Complaint. Malden's request is necessitated by the arbitrary and capricious and inconsistent decision issued on May 31, 2024 by Manza Arthur, as Supervisor of Records of the Public Records Division of the Office of William Francis Galvin ("Supervisor").¹ Malden's requested amendment is not unduly delayed, made in bad faith, prejudicial, nor futile, and in fact promotes judicial economy, as the Supervisor's decision was spurred by a remand order of this Court and deals with the same public records requests that were the basis of Malden's Original Complaint and Mr. Friedman's counterclaims.

In further support hereof, Malden submits its Memorandum of Law in Support of its

¹ At the time of the original complaint, the Supervisor of Records of the Public Records Division of the Office of William Francis Galvin was Rebecca S. Murray, but has since changed to Manza Arthur.

Motion for Leave to file an Amended Complaint, with its Amended Complaint attached thereto and incorporated herein by reference as **Exhibit A**.

WHEREFORE, Malden respectfully requests that this Honorable Court ALLOW their Motion for Leave to File an Amended Complaint. In addition, Malden hereby requests a hearing on this Motion, pursuant to Superior Court Rule 9A(c).

Respectfully Submitted
Plaintiff
Malden Public Schools,
By its attorneys,

/s/ Felicia S. Vasudevan

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Dated: June 18, 2024

CERTIFICATE OF SERVICE

I, Felicia S. Vasudevan, counsel for Malden Public Schools, in the above-captioned case, certify that on this date I served the attached document filed through the Odyssey Electronic Filing System, via email and first-class mail to the following recipients:

Bruce Friedman
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/s/ Felicia S. Vasudevan
Felicia S. Vasudevan

Dated: June 18, 2024