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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO.:

22-2441

CAMBRIDGE STREETS FOR ALL, et al.,
Plaintiffs
v.
CITY OF CAMBRIDGE,
Defendant

FILED
IN THE OFFICE OF THE
CLERK OF COURTS
FOR THE COUNTY OF MIDDLESEX

JUN 10 2022

John A. Sullivan
CLERK

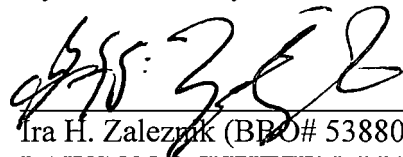
MOTION FOR IMPOUNDMENT

Plaintiffs Cambridge Streets for All, et al., hereby move this Honorable Court, pursuant to Trial Court Rules VIII, Rule 3, to impound all of the affidavits in this case for the duration of this matter. As grounds therefor, Plaintiffs state that one purpose of forming their voluntary association was to be able to engage in lobbying action, this legal action, and related activities, without being subject to intimidation and harassment. Certain members of the cycling community in Cambridge have engaged in a campaign of harassment and intimidation against the persons filing affidavits in this matter for their opposition to the Cycling Safety Ordinance. Most of the harassment takes the form of negative comments on social media, as well as threatening letters and harassment of customers. Public dissemination of their identities will subject them, their businesses and practices to harm, which would defeat the purpose of having a voluntary association. See e.g. NAACP v. Alabama ex. Rel. Patterson, 357 U.S. 449 (1958). Plaintiffs request that the affidavits in this case stay impounded until such time as their identities may be safely disclosed. Plaintiffs expect that this period of time will be relatively brief, and then impoundment can be lifted.

Superior Court, Middlesex, ss.
The within matter is set down for hearing on
June 17, 2022 at 2:00 p.m. in courtroom
1700215 at 1700215
John A. Sullivan
Assistant Clerk
Pappas, J.

WHEREFORE, Plaintiffs Cambridge Streets for All, et al., respectfully request this Honorable Court to keep the initial Affidavits filed in connection with Plaintiffs' Motion for a Preliminary Injunction be impounded and away from public view, until such time as the threat of harassment has abated.

Respectfully Submitted,
Plaintiffs,
Cambridge Streets for All, LLC, et al.,
By their Attorney,

A handwritten signature in black ink, appearing to read 'Ira H. Zaleznik', is written over a horizontal line.

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Dated: June 10, 2022