

**UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT**

DOE I and DOE II, :  
Plaintiffs, :  
VS. : Civil Action No.: 3:07CV00909(CFD)  
UNKNOWN INDIVIDUALS, :  
Defendants. : MARCH 5, 2008


**MOTION TO SUBSTITUTE NAME OF DEFENDANT**

Plaintiffs move to substitute the name “Joel Schellhammer” for the defendant currently named “Joel Schellhammer”.

The current name is the pseudonym of one of the defendants in the above-captioned matter. *See* Plaintiffs’ Am. Compl. at Caption, ¶ 56 (Nov. 9, 2007). But it is also the true name of an innocent third party with no connection to this case. That individual indicates that the use of his name as a pseudonym has resulted in Google linking his name to this case, which, plaintiffs agree with Mr. Schellhammer, is unfortunate and should be avoided if possible since Mr. Schellhammer himself has no connection whatever to this case


Plaintiffs seek to substitute the name of this defendant on all pleadings, such that plaintiffs would re-file the relevant pleadings with the substituted name to avoid further harm to the actual Mr. Schellhammer. Such a substitution does not prejudice the defendants in any way, since it does not change the substance of the plaintiffs’ allegations or the actual identities of the defendants - but it would respond the legitimate concerns of the real Mr. Schellhammer.

THE PLAINTIFFS

By   
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**CERTIFICATION OF SERVICE**

The addresses of all the defendants is unknown.

  
David N. Rosen