

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Civil Docket No.: **06 CA 11370 MLW**

FILED
IN CLERK'S OFFICE
2007 MAR -5 A 9:12
U.S. DISTRICT COURT
DISTRICT OF MASS.

Christine Varad,
Plaintiff,

v.

Reed Elsevier Incorporated,
d.b.a. *Lexis Nexis Corporation*,
Lexis Nexis Accurint,
Defendant.

MOTION TO AMEND COMPLAINT PURSUANT TO Fed. R. Civ. P. 15

Plaintiff Christine Varad ("Varad"), requests leave of Court pursuant to Fed.R.Civ.P. 15 to amend her complaint in order to correct a misnomer or misidentification describing Reed Elsevier Incorporated ("Reed") as a corporate defendant doing business under the fictitious name, "Lexis Nexis Corporation," "Lexis Nexis Accurint.

Reed's correct d.b.a. or fictitious business name is "LexisNexis, LexisNexis Risk & Information Analytics Group, Inc. See: Exhibit A. A copy of the proposed amended complaint accompanies this motion. See: Exhibit B.

Reed Elsevier Incorporated was fully and properly notified of the action against it within the period allowed by Fed.R.Civ.P. 4 (m) for the service of a summons and complaint. The change in the amended complaint is minor and concerns only an amendment correcting the present misstatement of Reed's fictitious business name or d.b.a. name, "Lexis Nexis Corporation," "Lexis Nexis Accurint" with an accurate