

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

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

Christine. Varad,
Plaintiff,

v.

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

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

On March 2, 2007, Plaintiff Christine Varad, requested leave of Court to amend her complaint pursuant to Fed.R.Civ.P. 15. The change in the Amended Complaint was to be minor, concerning only of an amendment correcting the misstatement of Reed's fictitious business name or d.b.a. name, "Lexis Nexis Corporation," "Lexis Nexis Accurint" with an accurate statement of the Reed's fictitious or d.b.a name, "LexisNexis, LexisNexis Risk & Information Analytics Group, Inc." Leave of court was granted allowing the amendments to be made to the complaint on April 4, 2007, docket no. 33.

Due to a computer virus that adversely affected all of Varad's Word computer files, a horrible clerical error was made. A faulty copy of the Amended Complaint was printed from a damaged computer file and then mistakenly filed and served on Reed. The error somehow went unnoticed until today. Reed was immediately contacted concerning the mistake and this motion was prepared in an effort to address and correct the problem as quickly as possible.