

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

ARMENIAN LIBRARY AND MUSEUM OF
AMERICA, INC.,

Plaintiff,

v.

MAYER MORGANROTH,

Defendant.

Case No. 11-cv-11862-MLW

**PLAINTIFF ARMENIAN LIBRARY AND MUSEUM OF AMERICA, INC.'S
SUPPLEMENTAL NOTICE**

Plaintiff Armenian Library and Museum of American, Inc. (“ALMA”), hereby submits this supplemental notice pursuant to Federal Rule of Civil Procedure 15(d).

On October 21, 2011, Defendant Mayer Morganroth, on behalf of the Estate of Dr. Jack Kevorkian, filed a complaint against ALMA and its curator in the Circuit Court for the County of Oakland in the State of Michigan (“Michigan action”). In the brief supporting his motion to dismiss, Morganroth used the Michigan action as evidence that the dispute between the parties should be litigated in Michigan. Def.’s Br. Supp. Mot. Dismiss Lack Personal Jur., ECF No. 5, at 11.

On January 18, 2012, the Oakland County Circuit Court dismissed the Michigan action without prejudice. Ex. A (Order / Re: Mot.). As the Circuit Court explained, because the “issue in both cases is identical,” the “Massachusetts action was filed first and it should proceed unless and until it is dismissed.” Ex. B, 12 (Tr. of Mot. for Summary Disposition). A copy of both the Order and the Transcript from the Michigan action are attached hereto as Exhibits A and B, respectively.

Respectfully submitted,

ARMENIAN LIBRARY AND MUSEUM OF
AMERICA, INC.

By its attorneys,

/s/ Zsaleh E. Harivandi

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Dated: February 7, 2012
Boston, Massachusetts

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically and served by mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ Zsaleh E. Harivandi

Zsaleh E. Harivandi