

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERK'S OFFICE

Friedrich Lu, Plaintiff)
v)
George Hulme,)
Trustees of Boston Public Library, Defendants)

Civil Action No 12-cv-11117-MLW

2013 JUL 31 P 4: 02

U.S. DISTRICT COURT
DISTRICT OF MASS.


PLAINTIFF'S MOTION TO COMPEL CITY ATTORNEY TO PRODUCE
CORRESPONDENCE BETWEEN COURT AND HER

(1) On July 1 (all dates are in 2013), plaintiff Friedrich Lu, as a pre-motion consultation under Local Rule 7.1 of this court, requested assistant corporate counsel Caroline Driscoll of City of Boston (who purportedly represents the defendants) to produce the record "a list of correspondence (in any form, way or manner) between district court and you June 6-13, 2013 (inclusive)." Exhibit 1.

(2) Conscious of guilt, the attorney July 2 sought to throw Lu off the scent, through half truth and omission ("my correspondence with the court"). Exhibit 2.

(3) In an July 11 email to her, Lu asked her point-blankly "about the court's correspondence with you." Exhibit 3.

(4) Since she has clammed up. Lu was supposed to file a motion to compel a week ago, see Exhibit 3. Around that day, strong currents and undertows of emotions flowed, and bad memories resurfaced. In the end, Lu opts for the minimalist style of the motion. For now.

Plaintiff: Friedrich Lu, pro se 

Date: July 31, 2013

Email address: x2flu@yahoo.com

Telephone number: none

Address: Pine Street Inn, 444 Harrison Avenue, Boston, MA 02118

A copy of this document was served electronically on Ms Driscoll on the same day.

-----Exhibit 1

[Subject:] Please Provide Me

Mon, Jul 1, 2013 at 7:14 PM

From: Friedrich Lu

To: Caroline.Driscoll@cityofboston.gov

a list of correspondence (in any form, way or manner) between district court and you June 6-13, 2013 (inclusive). If there was no correspondence, say so. In an affidavit--under penalties of perjury, that is.

-----Exhibit 2

RE: Please Provide Me

Tue, Jul 2, 2013 at 12:06 PM

From: Driscoll, Caroline

To: Friedrich Lu

Dear Mr. Lu,

All of my correspondence with the court, which is limited to just filings, is reflected in the docket.

Thank you,

Caroline

Caroline O. Driscoll
Assistant Corporation Counsel
City of Boston -- Law Department
City Hall, Room 615
Boston, MA 02201
(617) 635-4925
Caroline.Driscoll@cityofboston.gov

-----Exhibit 3

RE: Please Provide Me

Thu, Jul 11, 2013 at 7:33 PM

From: Friedrich Lu

To: Caroline.Driscoll@cityofboston.gov

Well, I was/am more concerned about the court's correspondence with you. Can you please send me an affidavit, regarding all correspondences with the court? If you wants to assert privilege, claim so but you still need to make a list, showing time and date, from whom and to whom. Your court filing need not go through that requirement.