

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

_____	)	
NuNu G. Kollie,	)	
	)	
Petitioner,	)	
	)	
v.	)	C.A. No. 16-11517-MBB
	)	
Steven W. Tompkins,	)	
<i>Sheriff, Suffolk County House of Correction,</i>	)	
	)	
Respondent.	)	
_____	)	

**RESPONDENT’S MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

As explained in the accompanying memorandum of law, the Petition fails to state a claim of unlawful detention. This case should be dismissed and all other requested relief denied.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Annapurna Balakrishna  
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**CERTIFICATION UNDER LOCAL RULE 7.1**

I have not conferred with petitioner to try and narrow or resolve the issues raised in this motion because petitioner is pro se and Local Rule 7.1(a)(2) requires only “counsel” to confer.

/s/ Annapurna Balakrishna  
Annapurna Balakrishna

*Motion allowed. S/M Gordon, USDOJ 11/8/16*