

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JO-ANNA RUTHERFORD,	*
	*
Plaintiff,	*
	*
v.	*
	*
NEW ENGLAND ORTHOPEDIC	*
SURGEONS ADMINISTRATION,	*
	*
Defendant.	*
	*

CIVIL ACTION NO. 3:13-CV-30056-MAP

DEFENDANT’S MOTION FOR A MORE DEFINITE STATEMENT

Pursuant to Fed. R. Civ. P. 12(e), the Defendant, New England Orthopedic Surgeons, Inc., (“Defendant or NEOS”) moves the Court for an order requiring the Plaintiff, Jo-Anna Rutherford, to make a more definite statement of her Complaint. Plaintiff’s Complaint is so vague and ambiguous that Defendant cannot reasonably respond to it. More specifically, as set forth more fully in its Memorandum of Law, the Defendant requests that Plaintiff enumerate her legal claims in separate and distinct counts so that the Defendant may understand the legal claims leveled against it and can respond accordingly.

Respectfully Submitted,

 /s/ Amelia J. Holstrom
 Amelia J. Holstrom, Esq.
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*Allowed without
opposition. Plaintiff
will file a more definite
statement, setting forth*

Dated: May 6, 2013

*her claims as separate counts, on or before July
2013. Failure to file the statement will result in
dismissal of the complaint. So ordered.
Richard B. Pournazeri*