

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

JANE DOE,

Plaintiff,

v.

MASSACHUSETTS DEPARTMENT OF
CORRECTION; THOMAS A. TURCO III;
SEAN MEDEIROS; JAMES M. O’GARA JR.;
and STEPHANIE COLLINS,

Defendants.

Civil Action No. 1:17-CV-12255-RGS

**ASSENTED TO MOTION FOR
WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

Plaintiff Jane Doe moves this Honorable Court, pursuant to the authority of 28 U.S.C. § 2241(c)(5) and Fed. R. Civ. P. 81(a)(4), and respectfully states as follows:

- (1) Now pending before this Court is Ms. Doe’s Opposition to the Motion to Dismiss and Motion for Preliminary Injunctive relief, both in the above captioned case;
- (2) Ms. Doe’s presence and potential testimony is material and necessary to a just and fair hearing regarding Ms. Doe’s Opposition to the Motion to Dismiss and Motion for Preliminary Injunctive relief;
- (3) Ms. Doe must be able to consult with her attorneys in real time during this hearing on such dispositive motions;
- (4) Specifically, the preliminary injunction motion is fact-intensive and there may be a need for real-time input from Ms. Doe;
- (5) Ms. Doe’s appearance in court will enable the Court to see, based upon her physical appearance and characteristics, the indignity and debasement she suffers in a men’s correctional facility and that she is extremely vulnerable to sexualized harassment and

abuse;

(6) Ms. Doe is presently confined in the Norfolk Correctional Center in Norfolk, Massachusetts (“MCI Norfolk”); and

(7) The aforementioned hearing is set before this Court on February 28, 2018 at 2:30 p.m..

For the above mentioned reasons, Ms. Doe requests that this Court issue a *Writ of Habeus Corpus Ad Testificandum* to Sean Medeiros, the Superintendent of MCI Norfolk, to bring Ms. Doe before this Court on February 28 at 2:30 p.m..

(8) Defendants have assented to this Motion, and to Ms. Doe’s appearance in Court.

(9) A copy of the proposed order is attached hereto.

Respectfully submitted,

Plaintiff Jane Doe, By Her Attorneys

/s/ J. Anthony Downs
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Dated: February 16, 2018

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on February 16, 2018.

/s/ J. Anthony Downs_____

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**[PROPOSED] ORDER GRANTING MOTION FOR
WRIT OF HABEAS CORPUS AD TESTIFICANDUM**

Upon consideration of Plaintiff’s assented to Motion for *Writ of Habeas Corpus Ad Testificandum*, it is hereby ORDERED that said Motion for *Writ of Habeas Corpus Ad Testificandum* is GRANTED. This Court issues a *Writ of Habeus Corpus Ad Testificandum* to Sean Medeiros, the Superintendent of MCI Norfolk, to bring Ms. Doe before this Court on February 28 at 2:30 p.m..

IT IS SO ORDERED.

Dated: February _____, 2018

Hon. Richard G. Stearns