

SCANNED  
DATE: 9/16/04  
BY: M.F.  
August 23, 2004

Richard T. Manning Pro Se  
Six Chesbrough Road  
Boston, Ma 02132-3810  
Tel. 617-325-3010

**United States District Court**

District of Massachusetts

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**Richard T. Manning** )  
**Plaintiff** )  
**V.** )  
 )  
**United States of America** )  
**The State of Massachusetts** )  
**The City of Boston** )  
**The City of Pittsfield** )  
**The City of Brookline** )  
**The Town of Westwood** )  
**Suffolk County** )  
**Norfolk County** )  
**AT&T Broadband** )  
**Comcast** )  
**General Electric** )  
**Viacom** )  
**Walt Disney Company** )  
**UNUM Life Insurance Co.** )  
**Blue Cross Blue Shield of Mass.** )  
**Faulkner Hospital** )  
**Beth Israel Deaconess Medical Ctr.** )  
**Bournewood** )  
**Westwood Pembroke Health Care** )  
**Fallon Ambulance Service** )  
**Eascare, LLC** )  
**AMR of Massachusetts, Inc** )  
**Dana Farber Cancer Institute** )  
**Arnold Communications** )

Civil Action Number

04 - 10401 ~~TDS~~ GAO

**Plaintiff Richard T. Manning notifies the court of a Motion to move for Summary Judgment with regards to Defendants failing to answer as of August 23, 2004. The following Defendants have failed to answer in writing to the plaintiff as of Monday August 23, 2004, United States of America, Commonwealth of Massachusetts, City of Brookline, Suffolk County, Walt Disney Company, Bournewood, Westwood Pembroke Health Care, Fallon Ambulance Service, Eascare, LLC, Arnold Communications.**

1) Plaintiff Richard T. Manning submits a motion for summary judgment after several defendants failed to answer the civil action complaint 04 10401 PBS.

Realizing the 1946 amendment to Rule 56 of the Federal rules of civil procedure

The plaintiff submits a motion for summary judgment after the expiration of 20 days after service of the complaint upon the defendants, Commonwealth of Massachusetts, City of Brookline, Suffolk County, Walt Disney Company, Bournemouth, Westwood Pembroke Health Care, Fallon Ambulance Service, Eascare LLC, Arnold Communications. All of which failed to answer the complaint in writing to the plaintiff and to the court after 20 days and now after 60 days the defendants along with the United States of America have failed to answer the complaint.

2) The State of Massachusetts( who called on July 8, 2004 and left a message that they would not be responding as can be seen in a supporting affidavit to the court) and the Fallon ambulance company (who called and spoke to the plaintiff on August 23, 2004 at 9am to 9:35am), are the only defendants in this group that answered but not in a written response to me and to the court. Fallon did however through their attorney state over the phone that written responses to the court and to the plaintiff were going to be drafted and served.

3) Each defendant along with a complaint was given the opportunity to settle the complaint. As of today none of these defendants has settled and none have answered in the proper manner as described by the Federal rules of Civil procedures. Like I stated in a letter Dated June 3, 2004 sent to the defendants, the plaintiff is only able to represent in a civil action and if the court sees that it is criminal action that is necessary, that is to be

the decision of the court.

4) The plaintiff now motions the court for summary judgment and seeks its opinion of the complaint with regards to those defendants listed in this letter. Further more many of the defendants that did answer seemed to have been utilizing the Pacer system and drafted almost identical responses in the form of motions however no real answer to the complaint has ever really been given. The complaint is clear and precise and I now wish the court to rule with a summary judgment for the Plaintiff Richard T. Manning in the civil action 04 10401 ~~PDS~~ GAO.

Sincerely,



**Richard T. Manning Pro Se**

Signature Valid

Richard T Manning Pro Se

Six Chesbrough Road

Boston, Ma 02132-3810

Tel. 6176-325-3010

Digitally signed by Richard T. Manning Pro Se  
DN: cn=Richard T. Manning Pro Se, c=US  
Date: 2004.08.30 08:03:59 -0400  
Reason: I am the author of this document  
Location: Six Chesbrough Road Boston, MA  
02132-3810

I certify that a copy of this document will be mailed by registered US Mail to the Federal District Court in Boston, Massachusetts. As well as to all the defendants. In this list United States of America, The Commonwealth of Massachusetts, The City of Boston, The City of Pittsfield, The City of Brookline, The Town of Westwood, Suffolk County, Norfolk County, AT&T Broadband Comcast ,General Electric, Viacom ,Walt Disney Company ,UNUM Life Insurance Co., Blue Cross Blue Shield of Mass. , Faulkner Hospital, Beth Israel Deaconess Medical Center, Bournewood ,Westwood Pembroke Health Care ,Fallon Ambulance Service, Eascare LLC AMR of Massachusetts, Inc. ,Dana Farber Cancer Institute, Arnold Communications.

Signed and certified by Richard T. Manning Pro Se



**Richard T. Manning Pro Se**

Signature Valid

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02132-3810

Date August 30, 2004