

Docketed 9/14/2026

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

SUPERIOR COURT DEPARTMENT

THE COMMITTEE FOR
MASSACHUSETTS VOTER
IDENTIFICATION BALLOT QUESTION,

and

JEFFREY COHEN,

Plaintiffs,

v.

BEN KAUFMAN, in his official capacity as
Clerk of the Town of Brookline,
Massachusetts,

and

TOWN OF BROOKLINE,
MASSACHUSETTS

Defendants.

2682CV01051

Civil Action No.: _____

COMPLAINT

INTRODUCTION

1. Plaintiffs The Committee for Massachusetts Voter Identification Ballot Question (“Committee”) and Jeffrey Cohen (“Cohen”) bring this action against Defendants Ben Kaufman, in his official capacity as Clerk of the Town of Brookline, Massachusetts and the Town of Brookline, Massachusetts, to compel compliance with the Massachusetts Public Records Law, G.L. c. 66, §§ 1 *et seq.*

PARTIES

2. Plaintiff Committee is a political committee registered with the Massachusetts Office of Campaign and Political Finance (CPF ID 95517) and with its principal place of

business located at 167 Washington Street, Norwell, MA 02061-1797. Its purpose is to promote the integrity of elections by, e.g., supporting a Voter ID ballot question in the Commonwealth of Massachusetts. It is comprised of grass roots activists who, among other activities, research and analyze public records to determine whether voter rolls are current, accurate, and comply with federal and state law.

3. Plaintiff Cohen is a natural person residing at 18 Cobalt Street, Wilmington, MA 01887-3803. Plaintiff Cohen is the Chairman of Plaintiff Committee.

4. On information and belief, Defendant Ben Kaufman (“Kaufman”) is the Clerk for the Town of Brookline, Massachusetts and is responsible for receiving and responding to public records requests, and has a principal place of business located at 333 Washington Street, Brookline, MA 02445-6853.

5. On information and belief, Defendant Town of Brookline, Massachusetts (“Brookline”) is a political subdivision of Massachusetts (i.e., a municipality) with its principal place of business located at 333 Washington Street, Brookline, MA 02445-6853.

JURISDICTION AND VENUE

6. This Court has jurisdiction over this action pursuant to G.L. c. 66, §§ 10A(c) and (d), which authorize a person who submits an initial request for public records to bring an action in the Superior Court “to enforce the requirements” of the Public Records Law and to obtain legal and equitable remedies, including injunctive relief, an award of attorneys’ fees and costs, and punitive damages where it has been demonstrated that a defendant agency or municipality did not act in good faith.

7. This Court has jurisdiction over Plaintiffs' request for a declaratory judgment because the question of its right of access to the requested documents constitutes an actual case or controversy subject to G.L. c. 231A, § 1, the statutory procedure for declaratory judgments.

8. G.L. c. 66, § 10A(c) provides that any suit to enforce the Public Records Law against a municipality shall be brought in the Superior Court for the county in which the municipality is located.

FACTS

The First Public Records Request – August 1, 2026

9. On August 1, 2026 Plaintiff Cohen, acting in his personal capacity, submitted a Public Records Request to Defendants via email, a true and accurate copy of which appears below:

On Saturday, August 1, 2026 at 03:50:19 PM EDT, Jeffrey Cohen <jnc978@verizon.net> wrote:

Dear Clerk,

I am requesting the following Extract available through the state's VRIS system:

Extract #8, VOT- current list of voters

Please note that this is a request for an Extract, not Report. When the Extract is returned to you from the state, please provide it to me exactly as you receive it (i.e. pipe '|' delimited .txt files). Please don't import the Extract into Excel or change the name of the file.

Thank you very much for your attention to this request.

Jeff Cohen

MA4FairElections

10. A response from Defendants to the August 1 Public Records Request was due on August 17, 2026. G.L. c. 66, § 10. Plaintiff Cohen did not receive any response by that date.

11. On August 19, 2026 Plaintiff Cohen emailed Defendant Kaufman to inquire as to the status of the August 1 Public Records Request. A true and accurate copy of that email appears below:

From: Jeffrey Cohen <jnc978@verizon.net>
To: Ben Kaufman <bkaufman@brooklinema.gov>
Sent: Wednesday, August 19, 2026 at 09:06:13 AM EDT
Subject: Re: Public record request

Dear Clerk,

This public record request was submitted more than 10 days ago and you have yet to respond. When can I expect to receive this public record?

Jeff Cohen
MA4FairElections

On Saturday, August 1, 2026 at 03:50:19 PM EDT, Jeffrey Cohen <jnc978@verizon.net> wrote:

Dear Clerk,

I am requesting the following Extract available through the state's VRIS system:

Extract #8, VOT- current list of voters

Please note that this is a request for an Extract, not Report. When the Extract is returned to you from the state, please provide it to me exactly as you receive it (i.e. pipe '|' delimited .txt files). Please don't import the Extract into Excel or change the name of the file.

Thank you very much for your attention to this request.

Jeff Cohen
MA4FairElections

12. Defendant Kaufman did not respond to the August 19 email.

13. To date, Defendants have not responded to the August 1 Public Records Request.

The Second Public Records Request – August 18, 2026

14. On August 18, 2026 Plaintiff Cohen, acting in his capacity as Chairman of Plaintiff Committee, submitted a Public Records Request to Defendants via Defendant Brookline's online portal. A true and accurate copy of the Public Records Request appears below:

Description of Request			
Request Number	2026-0365	Department	Town Clerk
Request Sent Date	08/19/2026 09:04 AM	Request Received Date	08/19/2026 09:04 AM
Response Due By	09/02/2026	Response Sent On	[Not Yet Sent]
Request Detail	Dear Clerk, This is a request pursuant to the Massachusetts Public Records Law (Mass. General Laws ch. 66, sec. 10). I am requesting Extract #8, VOT-current list of registered voters. Please note that this is a request for an Extract, not Report. When the Extract is returned to you from the state, please provide it to me exactly as you receive it (i.e. pipe ' ' delimited .txt files). Please don't import the Extract into Excel or change the name of the file. Jeff Cohen President of the Committee for Massachusetts Voter Identification Ballot Question OCPF #95517		

15. The August 18 Public Records Request was substantially similar to the August 1 Public Records Request.

16. Defendants acknowledged their receipt of the August 18 Public Records Request upon its submission. For tracking purposes, Defendants assigned the reference number 2026-0365 to the Public Record Request.

17. To date, Defendants have not responded to Plaintiffs' August 18 Public Records Request.

18. As of today, September 14, 2026, Defendants have had twenty-nine (29) business days to respond to the August 1 Public Records Request and eighteen (18) business days to respond to the August 18 Public Records Request. Defendants have provided no documents or information responsive to the two Public Records Requests in violation of G.L. c. 66, § 10.

COUNT I

(Violation of Public Records Law, G.L. c. 66, § 10)

19. Plaintiffs reallege and incorporate by reference the allegations set forth in paragraphs 1-18.

20. Plaintiffs “may initiate a civil action to enforce the requirements of this chapter” in the Superior Court, which has “available all remedies at law or in equity” to remedy a violation. G.L. c. 66, § 10A(c).

21. Under the Public Records Law, G.L. c. 66, § 10(a), public entities of the Commonwealth and its political subdivisions must “at reasonable times and without unreasonable delay permit inspection or furnish a copy of any public record.” Defendants are subject to the Public Records Law.

22. On August 1, 2026 and again on August 19, 2026 Plaintiffs submitted Public Records Requests to Defendants.

23. Defendants have not produced any of the requested public records.

24. No exemption to the Public Records Law permits Defendants to refuse to provide access to and copies of any of the requested records. Defendants’ failure to do so violates the Public Records Law.

25. Defendants’ failure to comply with the Public Records Law raises a question whether it has acted in “good faith” and renders its subject to exemplary damages under G.L. c. 66, § 10A(d)(4), as well as other statutory remedies.

COUNT II

(Declaratory Judgment, G.L. c. 231A, § 1)

26. Plaintiffs reallege and incorporate by reference the allegations set forth in paragraphs 1-25.

27. A genuine case or controversy has arisen between Plaintiffs and Defendants as to whether the items sought in the Public Records Request are public records available for inspection and copying.

28. Plaintiffs request that the Court declare that the requested documents are public records for purposes of the Public Records Law and that Defendants have violated Plaintiffs' right of access under the Public Records Law to the records requested.

PRAYER FOR RELIEF

WHEREFORE, the Plaintiffs respectfully requests that this Court:

(1) Enter judgment for Plaintiffs and against Defendants on Count I for violation of G.L. c. 66, § 10A, finding that Defendants failed to comply with the Public Records Law as to Plaintiffs' two Public Records Requests;

(2) Order Defendants to immediately (i) request extracts from the Massachusetts Voter Registration Information System ("VRIS"), (ii) conduct all necessary searches for all records, responsive to the two Public Records Requests, and (iii) demonstrate that Defendants made the extract requests and employed search methods reasonably likely to lead to the discovery of responsive records;

(3) Enter judgment for Plaintiffs and against Defendants on Count II for a declaratory judgment, and declare that the records sought by the two Public Records Requests must be disclosed under G.L. c. 66, § 10A;

(4) Order Defendants to produce within ten (10) calendar days all responsive records to the two Public Records Requests;

(5) Award Plaintiffs reasonable attorneys' fees and costs pursuant to G.L. c. 66, § 10A(d)(2);

(6) Assess whether Defendants acted in "good faith" or are subject to exemplary damages under the Public Records Law; and

(7) Award such other relief as this Court may deem just and proper.

Respectfully submitted,

Dated: September 14, 2026

/s/ Brian M. Gaff

Brian M. Gaff (BBO No. 642297)

215 South Broadway, Suite 308

Salem, NH 03079-3374

857-719-0100

781-581-9134 (fax)

bgaff@lawbmg.com

*Attorney for The Committee for Massachusetts
Voter Identification Ballot Question, and
Jeffrey Cohen.*

CIVIL ACTION COVER SHEET		DOCKET NUMBER 2682CV01051	Massachusetts Trial Court Superior Court COUNTY Norfolk Superior Court	
Plaintiff THE COMMITTEE FOR MASSACHUSETTS VOTER IDENTIFICATION BALLOT QUESTION		Defendant: BEN KAUFMAN, in his official capacity as Clerk of the Town of Brookline, Massachusetts		
ADDRESS: 167 Washington Street Norwell, MA 02061-1797		ADDRESS: 333 Washington Street Brookline, MA 02445-6853		
Plaintiff: JEFFREY COHEN ADDRESS: 18 Cobalt Street Wilmington, MA 01887-3803		Defendant: TOWN OF BROOKLINE, MASSACHUSETTS ADDRESS: 333 Washington Street Brookline, MA 02445-6853		
Plaintiff Attorney: Brian M. Gaff ADDRESS: 215 South Broadway, Suite 308 Salem, NH 03079-3374		Defendant Attorney: ADDRESS:		
BBO: 642297		BBO:		
TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)				
CODE NO. AD1	TYPE OF ACTION (specify) Equity Action involving Municipality	TRACK A	HAS A JURY CLAIM BEEN MADE? ☐ YES ☒ NO	
*If "Other" please describe:				
Is there a claim under G.L. c. 93A? ☐ YES ☒ NO		Is there a class action under Mass. R. Civ. P. 23? ☐ YES ☒ NO		
STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A				
The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. (Note to plaintiff: for this form, do not state double or treble damages; indicate single damages only.)				
<u>TORT CLAIMS</u>				
A. Documented medical expenses to date				
1. Total hospital expenses		_____		
2. Total doctor expenses		_____		
3. Total chiropractic expenses		_____		
4. Total physical therapy expenses		_____		
5. Total other expenses (describe below)		_____		
		Subtotal (1-5): \$0.00		
B. Documented lost wages and compensation to date _____				
C. Documented property damages to date _____				
D. Reasonably anticipated future medical and hospital expenses _____				
E. Reasonably anticipated lost wages _____				
F. Other documented items of damages (describe below) _____				
		TOTAL (A-F): \$0.00		
G. Briefly describe plaintiff's injury, including the nature and extent of the injury:				
<u>CONTRACT CLAIMS</u>				
☐ This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a).				
Item #	Detailed Description of Each Claim	Amount		
1.				
Total				

Signature of Attorney/Self-Represented Plaintiff: X /s/ Brian M. Gaff		Date: September 14, 2026
RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court. 		
CERTIFICATION UNDER S.J.C. RULE 1:18(5) I hereby certify that I have complied with requirements of Rule 5 of Supreme Judicial Court Rule 1:18: Uniform Rules on Dispute Resolution, requiring that I inform my clients about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.		
Signature of Attorney: X /s/ Brian M. Gaff		Date: September 14, 2026

CIVIL ACTION COVER SHEET INSTRUCTIONS — SELECT A CATEGORY THAT BEST DESCRIBES YOUR CASE*

AC Actions Involving the State/Municipality^{†*}

AA1 Contract Action involving Commonwealth,
Municipality, MBTA, etc. (A)
AB1 Tortious Action involving Commonwealth,
Municipality, MBTA, etc. (A)
AC1 Real Property Action involving
Commonwealth, Municipality, MBTA etc. (A)
AD1 Equity Action involving Commonwealth,
Municipality, MBTA, etc. (A)
AE1 Administrative Action involving
Commonwealth, Municipality, MBTA, etc. (A)

CN Contract/Business Cases

A01 Services, Labor, and Materials (F)
A02 Goods Sold and Delivered (F)
A03 Commercial Paper (F)
A04 Employment Contract (F)
A05 Consumer Revolving Credit - M.R.C.P. 8.1 (F)
A06 Insurance Contract (F)
A08 Sale or Lease of Real Estate (F)
A12 Construction Dispute (A)
A14 Interpleader (F)
BA1 Governance, Conduct, Internal
Affairs of Entities (A)
BA3 Liability of Shareholders, Directors,
Officers, Partners, etc. (A)
BB1 Shareholder Derivative (A)
BB2 Securities Transactions (A)
BC1 Mergers, Consolidations, Sales of
Assets, Issuance of Debt, Equity, etc. (A)
BD1 Intellectual Property (A)
BD2 Proprietary Information or Trade
Secrets (A)
BG1 Financial Institutions/Funds (A)
BH1 Violation of Antitrust or Trade
Regulation Laws (A)
A99 Other Contract/Business Action - Specify (F)

* See Superior Court Standing Order 1-88 for an explanation of the tracking deadlines for each track designation: F, A, and X. On this page, the track designation for each case type is noted in parentheses.

†* Choose this case type if ANY party is the Commonwealth, a municipality, the MBTA, or any other governmental entity UNLESS your case is a case type listed under Administrative Civil Actions (AA).

‡ Choose this case type if ANY party is an incarcerated party, UNLESS your case is a case type listed under Administrative Civil Actions (AA) or is a Prisoner Habeas Corpus case (E97).

ER Equitable Remedies

D01 Specific Performance of a Contract (A)
D02 Reach and Apply (F)
D03 Injunction (F)
D04 Reform/ Cancel Instrument (F)
D05 Equitable Replevin (F)
D06 Contribution or Indemnification (F)
D07 Imposition of a Trust (A)
D08 Minority Shareholder's Suit (A)
D09 Interference in Contractual Relationship (F)
D10 Accounting (A)
D11 Enforcement of Restrictive Covenant (F)
D12 Dissolution of a Partnership (F)
D13 Declaratory Judgment, G.L. c. 231A (A)
D14 Dissolution of a Corporation (F)
D99 Other Equity Action (F)

PA Civil Actions Involving Incarcerated Party[‡]

PA1 Contract Action involving an
Incarcerated Party (A)
PB1 Tortious Action involving an
Incarcerated Party (A)
PC1 Real Property Action involving an
Incarcerated Party (F)
PD1 Equity Action involving an
Incarcerated Party (F)
PE1 Administrative Action involving an
Incarcerated Party (F)

TR Torts

B03 Motor Vehicle Negligence - Personal
Injury/Property Damage (F)
B04 Other Negligence - Personal
Injury/Property Damage (F)
B05 Products Liability (A)
B06 Malpractice - Medical (A)
B07 Malpractice - Other (A)
B08 Wrongful Death - Non-medical (A)
B15 Defamation (A)
B19 Asbestos (A)
B20 Personal Injury - Slip & Fall (F)
B21 Environmental (F)
B22 Employment Discrimination (F)
BE1 Fraud, Business Torts, etc. (A)
B99 Other Tortious Action (F)

RP Summary Process (Real Property)

S01 Summary Process - Residential (X)
S02 Summary Process - Commercial/
Non-residential (F)

RP Real Property

C01 Land Taking (F)
C02 Zoning Appeal, G.L. c. 40A (F)
C03 Dispute Concerning Title (F)
C04 Foreclosure of a Mortgage (X)
C05 Condominium Lien & Charges (X)
C99 Other Real Property Action (F)

MC Miscellaneous Civil Actions

E18 Foreign Discovery Proceeding (X)
E97 Prisoner Habeas Corpus (X)
E22 Lottery Assignment, G.L. c. 10, § 28 (X)

AB Abuse/Harassment Prevention

E15 Abuse Prevention Petition, G.L. c. 209A (X)
E21 Protection from Harassment, G.L. c. 258E(X)

AA Administrative Civil Actions

E02 Appeal from Administrative Agency,
G.L. c. 30A (X)
E03 Certiorari Action, G.L. c. 249, § 4 (X)
E05 Confirmation of Arbitration Awards (X)
E06 Mass Antitrust Act, G.L. c. 93, § 9 (A)
E07 Mass Antitrust Act, G.L. c. 93, § 8 (X)
E08 Appointment of a Receiver (X)
E09 Construction Surety Bond, G.L. c. 149,
§§ 29, 29A (A)
E10 Summary Process Appeal (X)
E11 Worker's Compensation (X)
E16 Auto Surcharge Appeal (X)
E17 Civil Rights Act, G.L. c.12, § 11H (A)
E24 Appeal from District Court
Commitment, G.L. c.123, § 9(b) (X)
E94 Forfeiture, G.L. c. 265, § 56 (X)
E95 Forfeiture, G.L. c. 94C, § 47 (F)
E99 Other Administrative Action (X)
Z01 Medical Malpractice - Tribunal only,
G.L. c. 231, § 60B (F)
Z02 Appeal Bond Denial (X)

SO Sex Offender Review

E12 SDP Commitment, G.L. c. 123A, § 12 (X)
E14 SDP Petition, G.L. c. 123A, § 9(b) (X)

RC Restricted Civil Actions

E19 Sex Offender Registry, G.L. c. 6, § 178M (X)
E27 Minor Seeking Consent, G.L. c.112, § 12S(X)

TRANSFER YOUR SELECTION TO THE FACE SHEET

EXAMPLE:

CODE NO.	TYPE OF ACTION (specify)	TRACK	HAS A JURY CLAIM BEEN MADE?
B03	Motor Vehicle Negligence-Personal Injury	<u> F </u>	☒ YES ☐ NO

STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A

DUTY OF THE PLAINTIFF — On the face of the Civil Action Cover Sheet (or on attached additional sheets, if necessary), the plaintiff shall state the facts on which the plaintiff relies to determine money damages. A copy of the completed Civil Action Cover Sheet, including the statement concerning damages, shall be served with the complaint. **A clerk-magistrate shall not accept for filing a complaint, except as otherwise provided by law, unless it is accompanied by such a statement signed by the attorney or self-represented litigant.**

DUTY OF THE DEFENDANT — If the defendant believes that the statement of damages filed by the plaintiff is inadequate, the defendant may file with the defendant's answer a statement specifying the potential damages which may result if the plaintiff prevails.

**A CIVIL ACTION COVER SHEET MUST BE FILED WITH EACH COMPLAINT.
IF THIS COVER SHEET IS NOT FILLED OUT THOROUGHLY AND
ACCURATELY, THE CASE MAY BE DISMISSED.**

**MOTION FOR CASE-SPECIFIC
MANAGEMENT PURSUANT TO
SUPERIOR COURT RULE 20**

DOCKET NUMBER

2682CV01051

**Trial Court of Massachusetts
The Superior Court**



CASE NAME:
THE COMMITTEE FOR MASSACHUSETTS VOTER IDENTIFICATION BALLOT QUESTION,

and

JEFFREY COHEN

v.

BEN KAUFMAN, in his official capacity as Clerk of the Town of Brookline, Massachusetts,

and

TOWN OF BROOKLINE, MASSACHUSETTS

Walter F. Timilty
Norfolk

☒ Clerk of Courts
☐ County

COURT NAME & ADDRESS

650 High Street
Dedham, MA 02026-1855

GENERAL INSTRUCTIONS

- This form is only for parties proposing or stipulating to a deviation from the standard rules governing this case. IF YOU DO NOT WANT TO MAKE ANY PROPOSAL, THEN YOU DO NOT NEED TO FILL OUT THIS FORM.
- YOU DO NOT NEED TO FILL IN ANY BLANKS UNLESS YOU WANT TO (except for case name, docket number and item (a) below). If you leave an item blank, then the usual court rules, orders, directives and policies will apply.
- Unless ALL parties agree, this document must be served upon all parties pursuant to Superior Court Rule 9A.
- If all parties agree to SOME items, but not others, then please submit TWO separate motions - one for all agreed-upon matters, and another for contested (or unagreed) matters.

IF YOU ARE REPRESENTING YOURSELF: Please be aware that some parts of this form involve giving up rights that may (or may not) be important for your protection. You may wish to learn more about these rights by, for instance, consulting an attorney or visiting the court's self- help website: www.mass.gov/courts/selfhelp.

a. (Required) This document is submitted by:

☐ ALL PARTIES

☒ THE FOLLOWING PARTY(IES) ONLY: The Committee for Massachusetts Voter Identification Ballot Question, Jeffrey Cohen

b. EARLY COURT CONFERENCE - SCHEDULING

Do you request a scheduling or case management conference with the Court at this time?

☒ YES ☐ NO

If YES: ☐ IN-COURT CONFERENCE on (proposed dates) at (2 or 3 PM)

☒ PHONE CONFERENCE on **10/26/2026** (proposed dates) at **3:00 p.m.** (2 or 3 PM)

c. JUDICIAL ASSESSMENT

Do you request a conference for the purpose of obtaining the session judge's non-binding assessment of this case?

☒ YES ☐ NO

If YES: ON **10/26/2026** (proposed dates) at **2:00 p.m.** (2 or 3 PM)

d. IMMEDIATE SCHEDULING OF A PROMPT AND FIRM, TRIAL DATE?

Do you want the Court to schedule a trial date at this time? ☐ YES ☒ NO

Do you propose a specific Trial Date or Range of Trial Dates?

☐ NOT AT THIS TIME ☐ PROPOSED TRIAL DATED(S):

If proposing a date, please predict the number of trial days (9 AM to 1PM):

The Court will make every effort to accommodate an agreed-upon proposed trial date.

**MOTION FOR CASE-SPECIFIC
MANAGEMENT PURSUANT TO
SUPERIOR COURT RULE 20**

DOCKET NUMBER

**Trial Court of Massachusetts
The Superior Court**



e. CHANGES TO STANDARD PRETRIAL DEADLINES?

Do you want changes in the deadlines for pretrial events (these cannot be longer than the standard tracking order for this case. See Superior Court Standing Order 1-88) or waiver of certain motions?

☒ YES ☐ NO

If YES - We/I propose the following:

	Shorter Deadlines (please specify)	Event Waived Entirely
Rule 12, 15, 19 Motions	<u>Nov. 13, 2026</u>	☐ Yes ☐ No
Discovery	<u>Jan. 25, 2027</u>	☐ Yes ☐ No
Summary Judgment	(if shorter deadlines, enter below)	☐ Yes ☐ No
Summary Judgment Served	<u>Feb. 22, 2027</u>	N/A
Summary Judgment Filed	<u>Apr. 5, 2027</u>	N/A
Final Pretrial Conference	<u></u>	N/A

If agreed, or approved by the court, this request will reassign this case to an Individual Track for purposes of Standing Order 1-88, instead of the track originally assigned to this case.

f. OTHER PROPOSALS FOR DISCOVERY, MOTIONS, TRIAL OR POST-TRIAL? (For examples, see Superior Court Rule 20(f) - (k))

- | | | |
|--|------------------------------|-----------------------------|
| 1. Limits on discovery? | ☐ Yes | ☐ No |
| 2. Limits on motions/in-court appearances? | ☐ Yes | ☐ No |
| 3. Varying the format for jury or bench trial? | ☐ Yes | ☐ No |
| 4. Limiting Post-Trial Motions or Appeals? | ☐ Yes | ☐ No |
| 5. Other? | ☐ Yes | ☐ No |

If you have any "YES" answers, please explain what you propose (court approval of the proposal(s) may be required):

EACH OF THE PARTIES WHO SIGNS (BELOW) MOVES THAT THE COURT APPROVE THE ABOVE REQUESTS AND ENTER AN ORDER ACCORDINGLY.

/s/ Brian M. Gaff

Party/Attorney for:

The Committee for Massachusetts Voter Identification Ballot Question and Jeffrey Cohen

Party/Attorney for:

Party/Attorney for:

Party/Attorney for:

COURT RULING

- ☐ APPROVED IN FULL and SO ORDERED.
☐ DENIED
☐ APPROVED IN PART AND DENIED IN PART AS FOLLOWS:

DATE:

So ORDERED:

(Associate Justice)