

COMMONWEALTH OF MASSACHUSETTS

4-16-19

SUFFOLK, ss.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

RICHARD A. GOREN,

Plaintiff

v.

JOHN DOE dba Arabianights-Boston,
Massachusetts,
and

STEVEN DuPONT aka
STEVEN CHRISTIAN DuPONT
Defendants.

Noted
5/15/13
GTS
GDN
SPM
RAC

CA # 2012-4121-H

2013-07-16 PM 2:16

MOTION TO AMEND DEFAULT JUDGMENT

Pursuant to Rule of Civil Procedure 59, plaintiff Richard A. Goren hereby moves to amend the Default Judgment and permanent injunction entered on March 20, 2013 restraining each defendant from continuing to publish, and/or from republishing all or any part of the John Doe dba Arabianights-Boston Massachusetts' January 31, 2012 Report # 831689 posted on the Ripoff Report website captioned "Complaint Review: Richard A. Goren." To achieve the purpose of the Default Judgment, plaintiff proposes to add an assignment and transfer of the copyright of the defendant John Doe dba Arabianights-Boston Massachusetts nka Christian DuPont's January 31, 2012 Report # 831689 posted on the Ripoff Report website captioned "Complaint Review: Richard A. Goren."

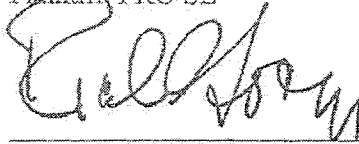
A proposed form of Judgment is attached as Exhibit A.

March 25, 2013

Q.S.
Offer/Review
1-13

Respectfully Submitted,

Richard A. Goren,
Plaintiff, PRO SE



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CERTIFICATE OF SERVICE

I hereby certify that on March 25, 2013, I gave notice of this Motion to Amend Default Judgment to John Doe dba Arabianights-Boston Massachusetts nka Christian DuPont and Steven DuPont aka Steven Christian DuPont by sending a copy by email to dupontmaui@gmail.com and dupontmaui@yahoo.com and by hand delivery to Christian DuPont, 46 Rutland Square, c/o Sextus Norden Jr., Boston MA 02118 and advising each defendant that I intended to seek a hearing on this motion at 2:00pm on Tuesday April 9, 2013 and to file any response to the Motion to Amend Default Judgment prior thereto to:

Suffolk Superior Court
Civil Clerk's Office
Suffolk Superior Courthouse, 12th floor
3 Pemberton Square
Boston, MA 02108



Richard A. Goren