

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN DELGADO,

Plaintiff,

v.

GEOFFREY NOBLE, in his official capacity as
Superintendent of the Massachusetts State Police;
and JOHN DOES 1 & 2 in their official capacities
as Massachusetts State Police officers and in their
personal capacities,

Defendants.

Civil Action No. _____

CERTIFICATION OF BASIS FOR RELATED CASE

JOHN DELGADO, by and through undersigned counsel, hereby submits this certification, pursuant to Local Rule 40.1(g), designating the above-captioned matter as a related civil case to *Jason Grant et al. v. Trial Court of the Commonwealth of Massachusetts et al.*, Case No. 1:25-cv-10770, in the United States District Court for the District of Massachusetts (hereinafter the “First Related Case”) and *Derosier et al. v. Noble et al.*, Case No. 1:25-cv-10812, in the United States District Court for the District of Massachusetts (hereinafter the “Second Related Case”). As a basis for the designation, Plaintiff state as follows:

1. One of the parties in this matter are the same as in the First Related Case: Geoffrey Noble, as Superintendent of the Massachusetts State Police.

2. Three of the parties in this matter are the same as in the Second Related Case: Geoffrey Noble, as Superintendent of the Massachusetts State Police, and John Does 1 and 2.

3. This case involves almost all the same issues of fact and law as the First Related Case and Second Related Case, notably the “buffer zone” established around the Norfolk Superior Courthouse to prohibit demonstrations regarding *Commonwealth v. Read*, Case No.

2282CR00017, in the Trial Court of the Commonwealth of Massachusetts, Superior Court Department, Norfolk County (hereinafter the “*Read Case*”).

4. This case involves the same occurrence as the Second Related Case, as Plaintiff was with Michel Bryant while he was newsgathering on the demonstrations giving rise to the First Related Case and the two John Doe defendants are the same two unidentified State Police officers who accosted the two of them during that occurrence.

WHEREFORE, pursuant to Local Rule 40.1(g), the above-captioned matter should be designated as a related civil case to *Jason Grant et al. v. Trial Court of the Commonwealth of Massachusetts et al.*, Case No. 1:25-cv-10770, in the United States District Court for the District of Massachusetts, and *Derosier et al. v. Noble et al.*, Case No. 1:25-cv-10812, in the United States District Court for the District of Massachusetts.

Dated: April 4, 2025.

Respectfully Submitted,

/s/ Marc J. Randazza

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