COMMONWEALTH OF MASSACHUSETTS

WORCESTER, ss.

SUPERIOR COURT
C.A. NO. 2285CV00971-A

JOAO DEPINA,

Plaintiff,

v.

WORCESTER COUNTY DISTRICT ATTORNEY'S OFFICE, JOSEPH D. EARLY, JR., ANTHONY MELIA, BOSTON POLICE DEPARTMENT, DANTE WILLIAMS, and RACHAEL ROLLINS,

Defendants.

DEFENDANTS WORCESTER COUNTY DISTRICT ATTORNEY'S OFFICE, JOSEPH D. EARLY, JR., ANTHONY MELIA, AND RACHAEL ROLLINS' MOTION TO STAY DISCOVERY AND FOR A PROTECTIVE ORDER

Defendants the Worcester County District Attorney's Office, Joseph D. Early, Jr., Anthony Melia, and Rachael Rollins (collectively, the "Commonwealth Defendants") hereby file this Motion to Stay Discovery and for a Protective Order. For the reasons described herein, there can be no discovery in this matter until after the Commonwealth Defendants' forthcoming Motion to Dismiss—which will raise defenses of absolute immunity, qualified immunity, sovereign immunity, and lack of subject matter jurisdiction—is decided:

1. This case, which was filed in August 2022, generally relates to the Worcester County District Attorney's Office's prosecution of the plaintiff on charges pursuant to G. L. c. 268, § 13B(b) – intimidating an attorney to interfere with a criminal

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