

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

DENNIS G. LOMAX,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 3:19-cv-30025-MGM
	)	
WIKIMEDIA FOUNDATION, INC. et al.,	)	
	)	
Defendants.	)	
	)	
	)	

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**DEFENDANT WIKIMEDIA FOUNDATION, INC.’S MOTION FOR LEAVE TO FILE A  
REPLY MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION TO DISMISS  
PLAINTIFF’S AMENDED COMPLAINT**

Pursuant to Local Rule 7.1(b)(3), Defendant Wikimedia Foundation, Inc. (“Wikimedia”) respectfully moves for leave to file an eight (8) page Reply Memorandum, a copy of which is attached as Exhibit A hereto, in support of its Motion to Dismiss Plaintiff’s Amended Complaint. In support of this request, Wikimedia states as follows:

1. On February 25, 2019, Plaintiff filed the initial complaint, which consisted of four numbered allegations, against Wikimedia and nine unidentified “John Doe” defendants. *See* ECF No. 1.
2. On May 20, 2019, Wikimedia moved to dismiss the initial complaint. *See* ECF No. 8.
3. After the Court granted an agreed-upon request for the extension of time, Plaintiff filed the Amended Complaint on June 17, 2019. *See* ECF No. 16. The Amended Complaint consists of 73 numbered allegations and named Wikimedia, eight individuals, and other John Does as defendants. *See id.*

4. On July 1, 2019, Wikimedia moved to dismiss the Amended Complaint as against Wikimedia. *See* ECF No. 19.

5. On July 15, 2019, the deadline to oppose the motion to dismiss the Amended Complaint expired prior to Plaintiff filing an opposition or requesting additional time to do so. *See* ECF No. 26 at 2.

6. On July 26, 2019, the Court provided additional time to Plaintiff to respond to the motion to dismiss the Amended Complaint by August 9, 2019. *See* ECF No. 26.

7. On August 8, 2019, Plaintiff filed an 18-page opposition to the motion to dismiss the Amended Complaint. *See* ECF No. 28.

8. Plaintiff's opposition inserts new allegations and raises legal theories concerning the claims for defamation and civil conspiracy that merit a reply. Wikimedia submits that a reply memorandum will materially assist the Court in its consideration of the issues presented in Wikimedia's motion.

WHEREFORE, Wikimedia respectfully requests that the Court grant its motion for leave to file a reply memorandum of no more than eight (8) pages in support of its motion to dismiss Plaintiff's Amended Complaint.

Dated: September 4, 2019

Respectfully submitted,

/s/ Christopher M. Morrison

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*Attorneys for Defendant Wikimedia  
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**LOCAL RULE 7.1(A)(2) CERTIFICATION**

I, Christopher M. Morrison, hereby certify that, pursuant to Local Rule 7.1(a)(2), counsel for Defendant Wikimedia Foundation, Inc. conferred with *pro se* Plaintiff, and Plaintiff did not assent to the relief sought by this motion.

Dated: September 4, 2019  
Boston, Massachusetts

/s/ Christopher M. Morrison  
Christopher M. Morrison

**CERTIFICATE OF SERVICE**

I, Christopher M. Morrison, hereby certify that I caused a true copy of the foregoing Defendant Wikimedia Foundation, Inc.'s Motion For Leave To File A Reply Memorandum Of Law In Support Of Its Motion To Dismiss Plaintiff's Amended Complaint to be served through the ECF system on all parties registered to receive ECF notices in this case, and to Plaintiff via first class mail, postage prepaid.

Dated: September 4, 2019  
Boston, Massachusetts

/s/ Christopher M. Morrison  
Christopher M. Morrison