

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE No. 1:20-CV-11889-MLW

Dr. SHIVA AYYADURAI)
Plaintiff,)
)
v.)
)
WILLIAM FRANCIS GALVIN,)
MICHELLE K. TASSINARI,)
DEBRA O’MALLEY,)
AMY COHEN,)
NATIONAL ASSOCIATION OF)
STATE ELECTION DIRECTORS,)
all in their individual capacities, and)
WILLIAM FRANCIS GALVIN,)
in his official capacity as Secretary)
of State for Massachusetts,)
Defendants,)
and)
TWITTER INC., proposed defendant)

JURY DEMANDED

STATUS REPORT

Honorable Mark Wolf
United States District Court for the District of Massachusetts
One Courthouse Way
Boston, MA 02210

Re: Howard Cooper, Esq.

Your Honor,

As instructed, I write to inform the Court regarding my retention of counsel. On Monday, May 24, 2021, I met with Howard Cooper from Todd & Weld LLP. After discussion, I have engaged Attorney Cooper and his firm to represent me. I have also engaged Attorney Charles Harder and his law firm, Harder LLP. I expect that each of these attorneys will file their appearances or move to be admitted *pro hac vice* in short order.

We have agreed that, subject to the Court’s approval, I will retain the ability to speak on my own behalf in court if I elect to do so, but that they will be present, at a minimum, for all court

hearings even if I am the person taking the lead in speaking. Their names will also be on all pleadings so as to satisfy the ethical rules.

As I need a brief period of time to formalize the engagement of these lawyers, I respectfully request the Court to adopt the following interim schedule:

1. Counsel will file their Notices of Appearance or motion(s) to be admitted *pro hac vice* no later than June 4, 2021.

2. By the same date, I plan to submit a proposed schedule for targeted discovery in the form of limited documents requests and depositions on the issues the Court has identified as inextricably intertwined with the pending motions to amend and to dismiss related to state action, qualified immunity and the forum selection clause. My counsel will, of course, meet and confer with defendants' counsel in the hope we can agree on the needed discovery and a schedule for it.

3. I ask that the Court thereafter hold a Status Conference during the week of June 14, 2021 to adopt a more formal schedule including for further briefing after the completion of the targeted discovery allowed by the Court. Mr. Cooper has informed me that he is busy with another trial beginning June 1st in state court but will be available for a conference the week of June 14th.

I thank the Court for allowing me the chance to retain counsel in this matter.

Yours sincerely,

/s/ Dr. Shiva Ayyadurai

Dr. Shiva Ayyadurai

Plaintiff, *pro se*

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Cambridge, MA 02138

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Date: May 25, 2021

CERTIFICATE OF SERVICE

Plaintiff certifies that he served this status report upon Defendants via their counsel via ECF and upon Twitter by email.

Respectfully submitted,

/s/ Dr. Shiva Ayyadurai

Date: May 25, 2021

Dr. Shiva Ayyadurai
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