

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

NATIONAL ASSOCIATION OF THE DEAF,
on behalf of its members, C. WAYNE DORE,
CHRISTY SMITH, and LEE NETTLES, on
behalf of themselves and a proposed class of
similarly situated persons defined below,

Plaintiffs,

v.

MASSACHUSETTS INSTITUTE OF
TECHNOLOGY,

Defendant.

Civil Action No. 15-30024-KAR

DEFENDANT MASSACHUSETTS INSTITUTE OF TECHNOLOGY'S
MOTION FOR JUDGMENT ON THE PLEADINGS

Pursuant to Rule 12(c) of the Federal Rules of Civil Procedure, Defendant Massachusetts Institute of Technology (“MIT”) hereby moves for judgment on the pleadings as to all claims alleged in the Complaint filed by Plaintiffs National Association of the Deaf, C. Wayne Dore, Christy Smith, and Lee Nettles (“Plaintiffs”). This Court should enter judgment in favor of MIT and against Plaintiffs for the reasons stated in the accompanying memorandum of law.

REQUEST FOR ORAL ARGUMENT

Pursuant to Local Rule 7.1(d), MIT respectfully requests oral argument. MIT believes that oral argument will assist the Court in deciding the issues presented in this Motion and the accompanying memorandum.

Dated: August 24, 2018

Respectfully submitted,

/s/ Roberto M. Braceras
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LOCAL RULE 7.1(A)(2) CERTIFICATION AND CERTIFICATE OF SERVICE

I hereby certify that counsel for Defendant conferred with opposing counsel in an effort to resolve or narrow the issues presented in this Motion prior to filing.

I also certify that a copy of the foregoing document, filed through the CM/ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies shall be served by first class mail, postage prepaid, on all counsel who are not served through the CM/ECF system on August 24, 2018.

/s/ Roberto M. Braceras