

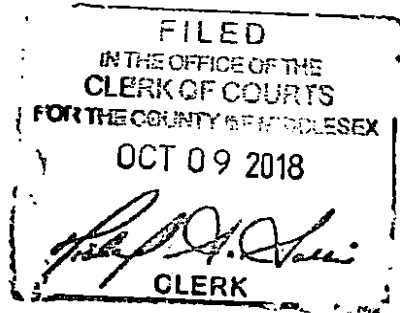
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COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, ss.

SUPERIOR COURT DEPARTMENT
CIVIL ACTION NO. 2013-2934 B

_____)
PLAINTIFF ERICKSON)
)
Plaintiff,)
)
v.)
)
ROSALIE A. CUNIO,)
JASON J. CUNIO,)
AND CHRISTOPHER J. CUNIO)
)
Defendants.)
_____)



MOTION TO SEQUESTER

Now comes the plaintiff and moves this Honorable Court to order all witnesses sequestered during the course of the trial.

Pursuant to Proposed Mass. R. Evidence 615, "at a party's request, the court may order witnesses excluded so that they cannot hear other witnesses' testimony. Or the court may do so on its own." See Zambarano v. Massachusetts Turnpike Authority, 350 Mass. 485, 215 N.E.2d 652 (1966) ("Sequestration of witnesses lies in the discretion of the trial judge.")

The sequestration of witnesses is necessary to ensure that witness testimony is not influenced or tainted by the testimony of other witnesses or by the evidence introduced at the hearing. Such sequestration is needed and necessary to ensure the fair administration of justice.

Plaintiff's Counsel:

11/7/18

Allowed by agreement

[Signature] J.

[Signature]

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