

FILED
IN CLERKS OFFICE

UNITED STATES DISTRICT COURT

2008 JAN 22 P 12: 54

DISTRICT OF MASSACHUSETTS

U.S. DISTRICT COURT
DISTRICT OF MASS.

SONY BMG MUSIC
ENTERTAINMENT, ET AL

LEAD CASE NUMBER

Plaintiffs,

03CV11661NG

v.

JOEL TENENBAUM

ORIGINAL CASE NUMBER

Defendant

03CV11446NG

MOTION FOR SANCTIONS UNDER RULE 11(b)
OF THE FEDERAL RULES OF CIVIL PROCEDURE

NOW COMES the Defendant JOEL TENENBAUM, appearing PRO SE, and respectfully moves for an entry of an order, pursuant to the Federal Rules of Civil Procedure Rule 11(b), sanctioning the Plaintiffs' attorney for presenting to the court multiple pleadings to the court which he reasonably believes are being presented for improper purposes, such as to harass, cause unnecessary delay, and needlessly increase the cost of litigation. It is clear from Exhibit 1 that the Plaintiffs' attorney is interested in needlessly increasing the cost of litigation and causing delays, etc., and not her clients.

Defendant JOEL TENENBAUM also moves for such other and further relief as to which he is entitled.

In support of his motion, JOEL TENENBAUM, submits his accompanying Affidavit.

WHEREFORE, Joel Tenenbaum, respectfully prays for an entry of an order, pursuant to Federal Rules of Civil Procedure Rule 11 (b) sanctioning the Plaintiffs' attorney , requiring the Court to impose an appropriate sanction under Federal Rules of Civil Procedure Rule 11(c), for any excess costs and expenses that have occurred to the Defendant as a result of such conduct, and for such other and further relief as to

which he is entitled.

January 18, 2008

Respectfully submitted,

By: _____
JOEL TENENBAUM
PRO SE
1666 Commonwealth Avenue
Brighton, Massachusetts 02135

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been mailed to all attorneys of record on this 18th day of January, 2008, addressed as follows:

JOHN R.BAUER
Robinson & Cole, LLP
One Boston Place
Boston, MA 02108

JOEL TENENBAUM