

SUFFOLK, ss.

SUPERIOR COURT
TRIAL COURT DEPARTMENT

12/28/23
John Hancock

JANE DOE 1 and JANE DOE 2, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

John Hancock Life Insurance Company
(U.S.A.), First Fitness Management, LLC,
and Commonwealth Flats Development Corp.
d/b/a Second Wave Health & Fitness,

Defendants.

**PLAINTIFFS' MOTION TO COMPEL DEFENDANT JOHN HANCOCK
LIFE INSURANCE CO. (U.S.A.) TO PRODUCE DOCUMENTS**

Plaintiffs Jane Doe 1 and Jane Doe 2 hereby move, pursuant to Mass. R. Civ. P. 37, to
compel Defendant John Hancock Life Insurance Company (U.S.A.) ("John Hancock") to
produce documents responsive to the Plaintiff's First Request for Production of
Documents, which was served a year and 5 months ago, on June 21, 2022. John Hancock
was previously granted a stay of discovery while its motion to dismiss was pending.
The stay expired on July 21, 2023, when this Court denied John Hancock's motion to
dismiss.

In support hereof, the Plaintiffs incorporate by reference their Memorandum in
support, the Affidavit of Michael J. Duran, the Plaintiffs' Document Requests, John
Hancock's Responses, and other supporting materials filed herewith.

Upon review, the gravamen of this complaint is that Hancock's space that was used as a Gym/locker room for Hancock employees was subject to videotaping without the knowledge of participants, nor their permission. Hancock denies its knowledge of the conduct that lead to the taping and further denies that it knows who was responsible for the actions. In light of these allegations, Hancock's Hancoct's referred to in the Court's previous decision is not relevant to this case. Hancock's motion to dismiss was denied. Hancock's motion to dismiss was denied. Hancock's motion to dismiss was denied.

*Non privileged documents
Order and Hancock shall produce all responsive
The Motion to Compel is Allowed according to this
Subject to a Motion
shall not be filed except under seal and
or videos
pic files
All files further
Packaged - Motion to discharge
entertain a Motion to discharge
the Court will
adequate showing, and investigate
identify any documents
Hancock and
Hancock's motion to dismiss was denied.*

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