

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PAUL WASGATT,
Plaintiff,

v.

ALLSTATE INSURANCE COMPANY, and
GLENN T. SHAPIRO,
Defendants.

Civil Action No. 4:20-cv-40118

PLAINTIFFS' MOTION TO AMEND COMPLAINT

Plaintiff Paul Wasgatt respectfully requests leave to file a second amended complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. In support of this motion to amend the complaint, plaintiff submits a copy of the proposed Second Amended Complaint (Exhibit "A" attached to his memorandum of law) and his memorandum of law filed currently herewith.

DATED: JANUARY 29, 2021

PLAINTIFF,
By his attorney,

/s/ Timothy K. Cutler
Timothy K. Cutler (BBO#636124)
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CERTIFICATE OF SERVICE

I hereby certify that the above document was filed through the CM/ECF system and will be electronically sent to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 29 day of January 2021.

/s/ Timothy K. Cutler
Timothy K. Cutler