

**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

PLAINTIFF’S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Paul Wasgatt respectfully submits this motion for injunctive relief as to defendant Allstate Insurance Company (“Allstate”) seeking the following orders:

1. Enjoin and restrain Allstate from further using Plaintiff’s name or likeness in the sale, promotion, marketing and advertising of its products or services;
2. Enjoin and restrain Allstate from suggesting or representing to the public that Plaintiff endorses Allstate or any of its products or services;
3. Enjoin and restrain Allstate from suggesting or representing to the public that Plaintiff is associated with Allstate or any of its products or services;
4. Order that Allstate within twenty (20) days of the Court’s issuing its order granting Plaintiff’s request for injunctive relief (i) identify all persons to whom Allstate sent an e-mail or other marketing or advertising materials that contained Plaintiff’s likeness or name, and (ii) provide Plaintiff’s counsel with copies of all of those communications and materials; and
5. Award Plaintiff such other relief as the Court may deem just and proper.

DATED: January 29, 2021

**PLAINTIFF/COUNTERCLAIM DEFENDANT,
PAUL WASGATT,
By His Attorney,**

/s/ Timothy K. Cutler
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CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on January 29, 2021.

/s/ Timothy K. Cutler
Timothy K. Cutler