

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

OLIVER ORTOLANI,

Plaintiff,

v.

COMMUNITY OF JESUS, INC., ARTS
EMPOWERING LIFE, INC.,
PERFORMING ARTS BUILDING
FOUNDATION, INC.,

Defendants.

Civil Case No.: 1:25-cv-12005-LTS

**DEFENDANTS' CONSENTED-TO MOTION FOR LEAVE TO FILE A SINGLE,
CONSOLIDATED MEMORANDUM OF LAW IN SUPPORT OF
DEFENDANTS' FORTHCOMING MOTIONS TO DISMISS**

Pursuant to Local Rule 7.1(b)(4), the Defendants Community of Jesus, Inc., Arts Empowering Life, Inc., and Performing Arts Building Foundation, Inc. (collectively, "Defendants"), respectfully request that this Court grant them permission to file a single, consolidated memorandum of law in support of their forthcoming Motions to Dismiss the Plaintiff's Complaint, not to exceed 40 pages in length, which will cover all Defendants. Plaintiff **consents** to the relief requested in this Motion.

In support hereof, the Defendants state as follows:

1. The Plaintiff initiated this action on July 16, 2025, by filing a 30-page, 171-paragraph Complaint, against the three Defendants.¹ The Complaint purports to assert nine (9) causes of action (including both state and federal claims), as follows:

- a. Count I: Alleged violation of the Trafficking Victims Protection Reauthorization Act ("TVPRA"), 18 U.S.C. §§ 1589 and 1595 – Forced Labor – Direct Liability;
- b. Count II: Alleged violation of the TVPRA, 18 U.S.C. §§ 1589 and 1595 – Forced Labor – Beneficiary Liability;

¹ If exhibits are included, Plaintiff's Complaint is 96 pages in length.

- c. Count III: Alleged violation of the TVPRA, 18 U.S.C. §§ 1590 and 1595 – Trafficking with Respect to Forced Labor – Direct Liability;
- d. Count IV: Alleged violations of the TVPRA, 18 U.S.C. §§ 1590 and 1595 – Trafficking with Respect to Forced Labor – Beneficiary Liability;
- e. Count V: Alleged violation of the TVPRA, 18 U.S.C. §§ 1589, 1590, 1594(a) and 1595 – Attempted Forced Labor and Trafficking;
- f. Count VI: Alleged violation of the TVPRA, 18 U.S.C. §§ 1589, 1590, 1592, 1594 and 1595 – Conspiracy to Recruit, Obtain, Provide, Transport and Harbor With Respect to Forced Labor;
- g. Count VII: Alleged violation of Mass. Gen. Laws c. 265, § 51 – Forced Services and Trafficking;
- h. Count VIII: Alleged violation of the Federal Racketeer Influenced and Corrupt Actions Act, 18 U.S.C. §§ 1961-68; and
- i. Count IX: Unjust Enrichment.

2. The Defendants are currently required to answer or otherwise respond to the Plaintiff's Complaint by December 1, 2025.

3. Local Rule 7.1(b)(4) provides, in relevant part, that “[m]emoranda supporting or opposing allowance of motions shall not, without leave of court, exceed 20 pages, double-spaced.”

4. The Defendants each intend to file a Motion to Dismiss the Plaintiff's Complaint. While each Defendant could individually file a 20-page brief, in the interest of efficiency and judicial economy, Defendants instead seek the Court's permission to file a single, joint memorandum of law not exceeding 40 pages, double spaced (excluding case caption, table of contents, table of authorities, signature blocks, and certifications) that covers all Defendants.

5. While the Defendants are working diligently to present their arguments to the Court as concisely as possible, the Defendants believe that the most efficient and concise way to do so is to file a single, consolidated Memorandum of Law on behalf of all three Defendants. However, given the length, volume, and nature of claims asserted in the Complaint, Defendants believe that, if they file a single brief, 40 pages are necessary to adequately present their arguments.

6. Counsel for the Defendants have conferred with counsel for the Plaintiff prior to filing this Motion, and Plaintiff's counsel **consents** to the relief sought in this Motion.

7. Furthermore, Defendants consent to Plaintiff filing a 40-page brief in response to Defendants' joint memorandum of law in support of Defendants' forthcoming Motions to Dismiss.

WHEREFORE, for the foregoing reasons, the Defendants respectfully request that the Court grant the Defendants leave to file a single, consolidated memorandum in support of their forthcoming Motions to Dismiss the Plaintiff's Complaint that is no more than 40 pages in length, double-spaced (excluding case caption, table of contents, table of authorities, signature blocks, and certifications).

COMMUNITY OF JESUS, INC., ARTS
EMPOWERING LIFE, INC., and
PERFORMING ARTS BUILDING
FOUNDATION, INC.,

By their attorneys,

/s/ Jeffrey S. Robbins

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Attorneys for Defendants

Dated: November 17, 2025

LOCAL RULE 7.1(a)(2) CERTIFICATION

I hereby certify that counsel for the Defendants have conferred with counsel for the Plaintiff, and Plaintiff consents to the relief sought in this Motion.

/s/ Jeffrey S. Robbins
Jeffrey S. Robbins

CERTIFICATE OF SERVICE

I, Bridgitte E. Mott, hereby certify that this document filed through the ECF system 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 November 17, 2025.

/s/ Bridgitte E. Mott
Bridgitte E. Mott