

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CHARLES M. MURRELL III,

Plaintiff,

v.

PATRIOT FRONT, THOMAS ROUSSEAU,  
AND JOHN DOES 1-99,

Defendants.

Civil No. 1:23-cv-11802

**PLAINTIFF'S MOTION FOR SERVICE BY ALTERNATIVE MEANS  
AND TO EXTEND THE SERVICE OF PROCESS DEADLINE**

Plaintiff Charles M. Murrell III hereby moves the Court, *ex parte* (but not under seal), pursuant to Federal Rule of Civil Procedure 4(e) for an Order granting him leave to effectuate alternative service of the Summons and the Complaint on Patriot Front via: (1) two email addresses publicly associated with Patriot Front (patriotfront@protonmail.com and patriotfront01@gmail.com); and (2) Patriot Front's social media accounts on Gab, Telegram, Bitchute, and Odysee.

Plaintiff further moves the Court, *ex parte* (but not under seal), pursuant to Federal Rules of Civil Procedure 4(m) and 6(b), and Local Rule 4.1, for an Order that (i) extends Plaintiff's deadline to serve Patriot Front (currently November 7, 2023) until 21 days after this Court grants Plaintiff's request for alternative service or, alternatively, by 120 days after November 7, 2023; and (ii) extends Plaintiff's deadline to serve Mr. Rousseau and the John Doe Defendants (also currently November 7, 2023), for an additional 120 days after November 7, 2023. This is Mr. Murrell's first request for an extension of his Rule 4(m) deadline to serve defendants. Mr. Murrell is seeking this extension because, as set forth in the accompanying Declaration of James

M. Gross and the Memorandum of Law, Plaintiff has acted diligently in trying to effect service but has not yet been able to serve the named defendants. Because Plaintiff has not yet served either named defendant, he was unable to ask whether they consent to this extension request.

In further support of this Motion, Mr. Murrell relies upon the accompanying Memorandum of Law, the Declaration of James M. Gross, and the exhibits attached thereto. For the reasons stated therein, Plaintiff respectfully requests that the Court enter an order that: (1) grants Plaintiff leave to effectuate alternative service of the Summons and the Complaint on Patriot Front via its known email addresses and social media accounts; (2) extends Plaintiff's deadline to serve Patriot Front (currently November 7, 2023) until 21 days after this Court grants Plaintiff's request for alternative service or, alternatively, by 120 days after November 7, 2023; and (3) extends Plaintiff's deadline to serve Mr. Rousseau and the John Doe Defendants for an additional 120 days after November 7, 2023.

Dated: November 2, 2023

Respectfully Submitted,

CHARLES M. MURRELL III

By his attorneys,

/s/ James M. Gross

James M. Gross (admitted *pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd of November, 2023, I caused a copy of the above document to be electronically filed using the CM/ECF system. To the extent necessary, Plaintiff will serve this Motion in accordance with this Court's ruling on the Motion.

*/s/ James M. Gross*

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James M. Gross