
UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,)	
an Illinois non-profit corporation, and)	
Danny Lee Shelton, individually,)	Case No.: 07-40098-FDS
)	
Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
Defendants.)	

**DEFENDANT ROBERT PICKLE'S MOTION FOR LEAVE
OF THE COURT TO FILE ELECTRONICALLY**

Defendant Robert Pickle moves for leave of the Court to file electronically.

1. The Electronic Case Files (ECF) System provides an excellent method of saving both time and expense in the litigation process, since it gives the required notice to the other parties in the case, and since it does not require expenditures for printing and mailing court filings, some of which filings can be quite lengthy.

2. While the ECF System is available to attorneys, it is not automatically available to *pro se* litigants.

3. While the Plaintiffs issued their initial disclosures on August 3, 2007, they refuse to authorize the inspection or production of any Rule 26(a)(1) materials. This has necessitated the filing of a Motion to Compel, which with accompanying memorandum, affidavit, and exhibits amounts to 52 pages. Because of not being able to file electronically, Defendant Pickle must mail

52 pages to the Court to be scanned into the record, and two separate sets of 52 pages to Plaintiffs' counsel.

4. Besides the additional delay and expense that such a process entails, such scanned filings are not electronically searchable as they would be if they could be filed electronically via a PDF file.

5. When the time comes to file other motions, such as motions to strike Plaintiffs' trademark claims or other portions of Plaintiffs' filings, the number of pages needing to be filed over time will end up being quite substantial.

6. Plaintiffs have already filed one emergency motion. Without the ability to file electronically, Defendant Pickle cannot respond to such emergency motions in a timely fashion due to having to copy, assemble, and mail submissions to the Court.

7. Even when filings are sent by the much more expensive U.S. Express Mail service from Halstad, Minnesota, to Worcester, Massachusetts, such filings would not reach the Court until two mail-delivery days after mailing, since outgoing mail from the Halstad Post Office, which closes at 4:30 pm, does not reach Fargo, North Dakota, until after the cut-off time of 5:10 pm for next-day Express Mail service to Massachusetts.

8. Defendant Pickle has the necessary computer skills and expertise to prepare PDF documents, to login to websites, and to upload documents to those websites.

9. Defendant Pickle is aware of the "Judiciary Conference Privacy Policy," and will redact all but the last four digits of social security numbers or financial account numbers, all but the year of birth for birth dates, and all but the initials of the names of minor children, as recommended for civil case files, should any such information be required or relevant in a particular filing.

WHEREFORE, I pray the Court to grant leave to Defendant Robert Pickle to use the ECF System to file electronically.

Respectfully submitted,

Dated: December 7, 2007

/s/ Robert Pickle

Robert Pickle, *pro se*
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CERTIFICATE OF SERVICE

I, Bob Pickle, do certify that I am over the age of 18 years of age and on this day I have caused service of this document to the Court and have served by first class mail, postage prepaid, a copy of this document and this Certificate of Service to Plaintiffs' counsel at Siegel, Brill, Greupner, Duffy & Foster, and Fierst, Pucci & Kane, LLP.

Dated: December 10, 2007

/s/ Bob Pickle