

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|  |   |                                    |
|--|---|------------------------------------|
| _____                                    | ) |                                    |
| JOHN PAUL BEAUDOIN, SR.,                 | ) |                                    |
|  | ) |                                    |
| Plaintiff,                               | ) |                                    |
|  | ) | Civil Action No. 1:22-cv-11356-NMG |
| v.                                       | ) |                                    |
|  | ) |                                    |
| CHARLES D. BAKER, individually and in    | ) |                                    |
| his Official Capacity as Governor of the | ) |                                    |
| Commonwealth of Massachusetts,           | ) |                                    |
| MARGARET R. COOKE, individually and      | ) |                                    |
| in her Official Capacity as Commissioner | ) |                                    |
| of the Department of Public Health of    | ) |                                    |
| the Commonwealth of Massachusetts,       | ) |                                    |
| MINDY HULL, individually and in her      | ) |                                    |
| Official Capacity as Chief Medical       | ) |                                    |
| Examiner of the Commonwealth of          | ) |                                    |
| Massachusetts,                           | ) |                                    |
| JANICE Y. GRIVETTI, MICHELE N.           | ) |                                    |
| MATTHEWS, ROBERT M. WELTON, and          | ) |                                    |
| JULIE HULL, individually and in their    | ) |                                    |
| Official Capacities as Medical Examiners | ) |                                    |
| in the Commonwealth of Massachusetts,    | ) |                                    |
|  | ) |                                    |
| Defendants.                              | ) |                                    |
| _____                                    | ) |                                    |

**REQUEST FOR HEARING**  
**REQUEST FOR ORAL ARGUMENT**

Plaintiff, John Paul Beaudoin, Sr., respectfully moves this honorable Court, under U.S. District Court, District of Massachusetts Local Rule 7.1(d), Request for Hearing.

Beaudoin is a pro se plaintiff and pleads ignorance of civil procedural rules. He would have included the request for hearing in his opposition memorandum had he known a hearing is

not automatically granted. Beaudoin thought a hearing did not take place in the prior case *Beaudoin v Baker et al* (2020) Docket No. 1:20-cv-11187-NMG due to covid restrictions.

### **ARGUMENT IN SUPPORT OF REQUEST**

Beaudoin wishes to alert the Court, through oral argument, of a number of nuances to the issue of redressability that are best argued in-person. Whether a law school would revoke its covid vaccine mandate is a matter of fact, not a matter of law; and such a fact would be manifest through Discovery such as a response to interrogatories from a Director of Admissions or President of a law school. The rest of the argument will reiterate the three (3) prongs of *Lujan v. Defenders of Wildlife*, 504 U.S. 555 in the nuanced prose of an oral dialog.

Although this case carries serious national and state policy ramifications and State governmental criminal accusations, *standing* should be divorced from these downstream issues. Justice is in peril across the United States due to the scope creep of Standing Doctrine that has infringed on the First Amendment right of a citizen to petition the government for redress of grievances. And in this case, the grievances are dire and include coercion to inject a toxin that affects a small percentage of the population. Beaudoin already suffers four (4) frequent side effects of covid vaccines: deafness, vertigo, tinnitus, and life-threatening deep vein thromboses (clots in his calf muscle). Because he has these covid vaccine frequent side-effects, he is prevented from a career that covid vaccinated people may enter. That is unconstitutional.

### **CONCLUSION**

For the reasons identified above, Plaintiff requests that the Court grant Plaintiff's motion to request a hearing, or brief to request oral arguments, whichever is the appropriate filing.

Respectfully submitted,

/s/ John Paul Beaudoin, Sr.  
JOHN PAUL BEAUDOIN, SR. (Pro se)  
17 Fairview Road  
Medfield, MA 02052  
Mobile 508-277-7276  
e-mail [johnbeaudoinr@gmail.com](mailto:johnbeaudoinr@gmail.com)

Dated: May 21, 2023

**CERTIFICATE OF SERVICE**

I hereby certify that this document was sent via e-mail attachment to the counsel for Defendant at the address below; and sent to the court clerk via hand delivery in the John Joseph Moakley United States Courthouse.

/s/ John Paul Beaudoin, Sr.  
JOHN PAUL BEAUDOIN, SR. (Pro se)

Dated: May 21, 2023

Recipients for Defendant:  
Daniel J. Hammond  
Assistant Attorney General  
Massachusetts Office of the Attorney General  
Government Bureau  
BBO # 559475  
One Ashburton Place, Rm. 2014  
Boston, Massachusetts 02108  
(617) 727-2200, ext. 2078  
[dan.hammond@mass.gov](mailto:dan.hammond@mass.gov)