UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS BOSTON DIVISION

Joyce Rowley,)	
Plaintiff, pro se)	
)	
v.)	Case No.
)	17-cv-11809-WGY
City of New Bedford)	
Defendant)	

CORRECTED MOTION FOR FORFEITURE

Plaintiff Rowley hereby requests a Court order for forfeiture of Asian elephant Ruth under Rule 64 of the Federal Rules of Civil Procedure. As Ruth is considered property of the City of New Bedford, and as her current confinement at Buttonwood Park Zoo jeopardizes her health and well-being, Rowley asks the Court for an Order to allow Ruth's immedate transfer of ownership to the Court so she may be relocated to one of the two elephant care facilities named in this lawsuit.

Respectfully submitted, /s/Joyce Rowley
Plaintiff, pro se

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of September 2019, the foregoing was filed electronically. Notice of this filing will be sent to all parties for whom counsel has entered an appearance by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Joyce Rowley Plaintiff, pro se PO Box 50251 New Bedford, MA 02745 508-542-8297