

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS**

PATRICK COLLINS, INC.,)	
)	
Plaintiff,)	Civil Case No. <u>3:12-cv-03161-RM-BGC</u>
)	
v.)	
)	
SHANNON VINCENT,)	
)	
Defendants.)	
_____)	

PLAINTIFF’S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

Plaintiff, Patrick Collins, Inc., by and through their undersigned counsel, hereby moves for the entry of an order granting Plaintiff’s Motion for Leave to file the attached Second Amended Complaint and states:

1. On June 14, 2012, the Plaintiff filed their original Complaint against unknown John Doe Defendants [CM/ECF 1].
2. On November 15, 2012, the Plaintiff filed their First Amended Complaint naming John Doe 4 [CM/ECF 13].
3. In response to third party subpoenas, the Plaintiff subsequently learned that John Doe 8 is Shannon Vincent.
4. Through this motion, the Plaintiff thus seeks leave to file a Second Amended Complaint for the purpose of adding Shannon Vincent as a named Defendant.
5. The granting of this motion will not prejudice any party.

WHEREFORE, Plaintiff respectfully requests this Court to grant their Motion and enter an order permitting Plaintiff to file their Second Amended Complaint, attached hereto as Exhibit “A.”

Dated: January 4, 2013

Respectfully submitted,

NICOLETTI & ASSOCIATES, PLLC

By: /s/ Paul J. Nicoletti
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CERTIFICATE OF SERVICE

I hereby certify that on January 4, 2013, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF and that service was perfected on all counsel of record and interested parties through this system.

By: /s/ Paul J. Nicoletti