## UNITED STATES DISTRICT COURT DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,

Plaintiff :

:

v. : C.A. No. 15-525

ROBERT F. STROM as the Finance Director of

THE CITY OF CRANSTON, et al. :

**Defendants** 

## PLAINTIFF'S MOTION TO AMEND THE COMPLAINT

Pursuant to F.R.Civ.P. 15(b)(2) and (c), Plaintiff Edward Caniglia hereby moves to amend the complaint to clarify that his claims for violation of his rights under the Fourth Amendment and Art. 1, Sec. 6 of the Rhode Island Constitution, (Count III), include that Defendants required him to submit to a psychological evaluation without a court order. Specifically, Plaintiff seeks to ad one clause to Paragraph 78. Plaintiff seeks to make corresponding changes to his Prayer for Relief, as well. A red-lined version of the proposed Amended Complaint is attached.

Plaintiff relies upon his accompanying memorandum including its exhibits.

## EDWARD CANIGLIA

By his attorneys,

/s/ Thomas W. Lyons

Thomas W. Lyons #2946 Rhiannon S. Huffman #8642 RHODE ISLAND AFFILIATE,

AMERICAN CIVIL LIBERTIES UNION

Strauss, Factor, Laing & Lyons One Davol Square, Suite 305

Providence, RI 02903 (401) 456-0700

tlyons@straussfactor.com

## **CERTIFICATION**

I hereby certify that on December 29, 2019, a copy of the foregoing was filed and served electronically on all registered CM/ECF users through the Court's electronic filing system. Parties may access this filing through the Court's CM/ECF system.

/s/ Thomas W. Lyons