

**BEFORE THE
POSTAL REGULATORY
COMMISSION WASHINGTON,
D.C. 20268**

DOCKET NO. C-2015-1

**COMPLAINT OF CENTER FOR ART AND MINDFULNESS, INC.
AND NORTON HAZEL AGAINST THE UNITED STATES POSTAL
SERVICE**

MOTION TO FILE AMENDED COMPLAINT

The Plaintiffs filed a five count Complaint against the United States Post Office (United States Postal Service) and two other defendants on December 29, 2014. The Defendant United States Postal Service filed a Motion to Dismiss on January 20, 2015. The Art Center and Mr. Hazel filed a Response to the Motion to Dismiss of the United States Postal Service on February 4, 2015 in which it stated that it would file an Amended Complaint to correct some pleading errors (such as correcting the name of the United States Post Office to United States Postal Service), to further elaborate upon the basis for PRC jurisdiction of several of the counts in the Complaint and to further elaborate the pleading of the Breach of Contract Claim (Count Three).

This is not filed to hinder or delay the proceeding in any way but for good cause. This Complaint was commenced on December 29, 2014 and this dispute is in its early stages. The PRC should grant a motion to amend the complaint liberally at this stage in the proceedings, as the Amended Complaint will aid in the determination of the jurisdiction of the PRC over the counts in the Amended Complaint and will aid

in its determination of the Motion to Dismiss filed by the USPS.

February 25, 2015

Respectfully Submitted,

/s/ Drew S. Backstrand

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