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UNOFFICIAL RECORD INDEX

**85 Unofficial Records Available Through
HAMPDEN County Superior Court Docket Sheet**

<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
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02	Hampden County Superior Court Docket Sheet - Document #02 - Row 18 - File Ref Nbr. - NA - 2016-04-19 - Plaintiff SARAH A. OULTON's Second Emergency <u>Ex Parte</u> Motion to Extend the Deadline by Which Service of Process Must Be Made
03	Hampden County Superior Court Docket Sheet - Document #03 - Row 32 - File Ref Nbr. 10 - 2016-05-27 Plaintiff's Emergency <u>Ex Parte</u> Motion to Extend Deadline for Service of Process and Serve by Alternate Means (Publication) - Bergeron
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<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
08	Hampden County Superior Court Docket Sheet - Document #08 - Row 37 - File Ref Nbr. 15 - 2016-05-27 - Service Returned for - Lincoln, Michael - LAST & USUAL
09	Hampden County Superior Court Docket Sheet - Document #09 - Row 38 - File Ref Nbr. 16 - 2016-05-27 - Service Returned for - The Jowdy Group, Inc. - PERSON IN CHARGE - AGENT
10	Hampden County Superior Court Docket Sheet - Document #10 - Row 39 - File Ref Nbr. 17 - 2016-05-27 - Service Returned for - Kelly, Richard - LAST & USUAL
11	Hampden County Superior Court Docket Sheet - Document #11 - Row 40 - File Ref Nbr. 18 - 2016-05-27 - Service Returned for - Jowdy, Alexander R. - LAST & USUAL
12	Hampden County Superior Court Docket Sheet - Document #12 - Row 41 - File Ref Nbr. 19 - 2016-05-27 - Service Returned for - Vecchio, Lisa A. - IN HAND
13	Hampden County Superior Court Docket Sheet - Document #13 - Row 42 - File Ref Nbr. 20 - 2016-05-27 - Service Returned for - Keough + Sweeney, Ltd. - PERSON IN CHARGE - AGENT
14	Hampden County Superior Court Docket Sheet - Document #14 - Row 43 - File Ref Nbr. 21 - 2016-05-27 - Service Returned for - Keough, Sean P. - PERSON IN CHARGE - AGENT
15	Hampden County Superior Court Docket Sheet - Document #15 - Row 44 - File Ref Nbr. 22 - 2016-05-27 - Service Returned for - Couture, Michael - PERSON IN CHARGE - AGENT

<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
16	Hampden County Superior Court Docket Sheet - Document #16 - Row 45 - File Ref Nbr. 23 - 2016-05-27 - Service Returned for - Winston Law Group, LLC - PERSON IN CHARGE - AGENT
17	Hampden County Superior Court Docket Sheet - Document #17 - Row 46 - File Ref Nbr. 24 - 2016-05-27 - Service Returned for - Sweeney II, Jerome V. - PERSON IN CHARGE - AGENT
18	Hampden County Superior Court Docket Sheet - Document #18 - Row 47 - File Ref Nbr. 25 - 2016-05-27 - Service Returned for - Winston, Neal - PERSON IN CHARGE - AGENT
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<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
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<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
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<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
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<u>Unofficial Record No.</u>	<u>Unofficial Record Name</u>
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Dated: July 17, 2021.

**RESPECTFULLY COMPILED AND
SUBMITTED UNDER THE PAINS AND
PENALTIES OF PERJURY,**



Sarah A. Oulton, pro se

1579CV00917 Oulton, Sarah A. et al vs. Hladick, Carol B. et al**NOTE - Petitioner's comments appear in color and red rectangles are placed around entries discussed in Petition**

- Case Type:
- Equitable Remedies
- Case Status:
- Closed
- File Date
- 12/24/2015
- DCM Track:
- A - Average
- Initiating Action:
- Declaratory Judgment G.L. c. 231A
- Status Date:
- 08/25/2016
- Case Judge:
-
- Next Event:
-

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[More Party Information](#)**Events**

<u>Date</u>	<u>Session</u>	<u>Location</u>	<u>Type</u>	<u>Event Judge</u>	<u>Result</u>
04/27/2016 02:00 PM	Civil A - Ct. Rm. 5	SPRF-2nd FL, CR 8 (SC)	Motion Hearing	Carey, Hon. Richard J	Held - Under advisement







Ticklers




















<u>Tickler</u>	<u>Start Date</u>	<u>Due Date</u>	<u>Days Due</u>	<u>Completed Date</u>
Service	12/24/2015	03/23/2016	90	08/25/2016
Answer	12/24/2015	04/22/2016	120	08/25/2016
Rule 12/19/20 Served By	12/24/2015	04/22/2016	120	08/25/2016
Rule 12/19/20 Filed By	12/24/2015	05/23/2016	151	08/25/2016
Rule 12/19/20 Heard By	12/24/2015	06/21/2016	180	08/25/2016
Rule 15 Served By	12/24/2015	02/16/2017	420	08/25/2016
Rule 15 Filed By	12/24/2015	03/20/2017	452	08/25/2016
Rule 15 Heard By	12/24/2015	03/20/2017	452	08/25/2016
Discovery	12/24/2015	12/13/2017	720	08/25/2016
Rule 56 Served By	12/24/2015	01/12/2018	750	08/25/2016
Rule 56 Filed By	12/24/2015	02/12/2018	781	08/25/2016
Final Pre-Trial Conference	12/24/2015	06/11/2018	900	08/25/2016
Judgment	12/24/2015	12/24/2018	1096	08/25/2016
Under Advisement	04/27/2016	05/27/2016	30	04/27/2016























Docket Information




<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>
01	12/24/2015 Original civil complaint filed. (In brown file folder)	1	
02	12/24/2015 Civil action cover sheet filed.	2	
03	12/24/2015 Demand for jury trial entered.		
04	12/24/2015 Appearance entered On this date Coreen Goodwin, Esq. added as Private Counsel for Plaintiff Sarah A. Oulton		
05	12/24/2015 Case assigned to: DCM Track A - Average was added on 12/24/2015		
06	12/24/2015 Appearance entered On this date James Bailey Brislin, Esq. added for Plaintiff Sarah A. Oulton	3	
07	03/11/2016 Plaintiff Sarah A Oulton's EMERGENCY Motion to extend time for Service by 30 days	4	
08	03/11/2016 Affidavit of Sarah A. Oulton	4.1	
09	03/11/2016 Endorsement on Motion to extend deadline by which service of process must be made (#4.0): ALLOWED		
10	03/17/2016 Plaintiff Sarah A Oulton's EMERGENCY, EX PARTE Motion of Legal Elements remove action due to improper venue to the Superior Court of Middlesex County.	5	 Image
11	03/17/2016 Affidavit of Sarah A. Oulton in support of motion to transfer due to improper venue.	5.1	
12	03/17/2016 Endorsement on Motion to remove action due to improper venue (#5.0): DENIED Venue may be addressed after service.		

#01




	Docket Date	Docket Text	File Ref Nbr.	Image Avail.	
13	04/15/2016	Opposition to to any extension of time filed by Mirick O'Connell DiMallie & Lougee LLP, Arthur P Bergeron, Esq., Jason A Port, Esq., John O Mirick, Esq. (See #7)	6		
14	04/15/2016	Attorney appearance On this date John O Mirick, Esq. added for Defendant Mirick O'Connell DiMallie & Lougee LLP			
15	04/15/2016	Attorney appearance On this date John O Mirick, Esq. added as Private Counsel for Defendant John O Mirick, Esq.			
16	04/15/2016	Attorney appearance On this date John O Mirick, Esq. added as Private Counsel for Defendant Jason A Port, Esq.			
17	04/15/2016	Attorney appearance On this date John O Mirick, Esq. added as Private Counsel for Defendant Arthur P Bergeron, Esq.			
18	04/19/2016	Plaintiff Sarah A Oulton's EMERGENCY, EX PARTE Motion to extend the deadline by which service of process must be made by an additional 30 days (Second Motion)	7	 Image	#02
19	04/19/2016	Affidavit of in support of plaintiff Sarah A. Oulton's second emergency ex parte motion to extend the deadline by which service of process must be made.	7.1		
20	04/27/2016	Matter taken under advisement The following event: Motion Hearing scheduled for 04/27/2016 02:00 PM has been resulted as follows: Result: Held - Under advisement			
21	04/27/2016	Endorsement on Motion to Extend the Deadline by which Service of Process Must be Made (#7.0): ALLOWED After hearing at which Atty. Mirick and Atty. Gallagher argued in opposition and after consideration of arguments of counsel, submissions, and law, the deadline by which service of process must be made is extended for 30 days from the date of this order.			
22	04/27/2016	Attorney appearance On this date Matthew J. Gallagher, Esq. added for Defendant Neal Winston, Esq. Individually and in his/her Capacity As Registered Agent of Winston Law Group	8		
23	04/27/2016	Attorney appearance On this date Matthew J. Gallagher, Esq. added for Defendant Michael Couture, Esq.	8		
24	05/19/2016	Attorney appearance On this date Coreen Goodwin, Esq. added for Plaintiff Sarah A Oulton on behalf of The Estate of Donald Paul Oulton			
25	05/19/2016	Attorney appearance On this date James Bailey Brislin, Esq. added for Plaintiff Sarah A Oulton on behalf of The Estate of Donald Paul Oulton			
26	05/19/2016	Attorney appearance On this date Coreen Goodwin, Esq. added for Plaintiff Sarah A Oulton on behalf of The Estate of Carol Jame Oulton			
27	05/19/2016	Attorney appearance On this date James Bailey Brislin, Esq. added for Plaintiff Sarah A Oulton on behalf of The Estate of Carol Jame Oulton			
28	05/19/2016	Party status: Defendant Andrew Hladick Individually and in his/her Capacity As a Lieutenant with the Town of Natick Fire Department: Dismissed;			
29	05/19/2016	Party status: Defendant John Does I-X: Dismissed;			
30	05/19/2016	Party status: Defendant Jane Does I-X: Dismissed;			
31	05/19/2016	Amended: amended complaint filed by Sarah A Oulton	9		
32	05/27/2016	Plaintiff Sarah A Oulton's EMERGENCY, EX PARTE Motion to extend deadline for service of process and to serve by alternative means (publication) as to defendant Arthur Bergeron Only.	10	 Image	#03
33	05/27/2016	Service Returned for Defendant Hladick, Carol B.: Service made at last and usual;	11	 Image	#04
34	05/27/2016	Service Returned for Defendant Keough, Jr., Esq., Joseph A: Service through person in charge / agent;	12	 Image	#05
35	05/27/2016	Service Returned for Defendant Hladick, Andrew: Service made at last and usual;	13	 Image	#06
36	05/27/2016	Service Returned for Defendant Oulton, David P: Service made at last and usual;	14	 Image	#07















	<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>	
37	05/27/2016	Service Returned for Defendant Lincoln, Michael B: Service made at last and usual;	15	 Image	#08
38	05/27/2016	Service Returned for Defendant The Jowdy Group, Inc.: Service through person in charge / agent;	16	 Image	#09
39	05/27/2016	Service Returned for Defendant Kelly, Richard: Service made at last and usual;	17	 Image	#10
40	05/27/2016	Service Returned for Defendant Jowdy, Alexander R: Service made at last and usual;	18	 Image	#11
41	05/27/2016	Service Returned for Defendant Vecchio, Lisa A: Service made in hand;	19	 Image	#12
42	05/27/2016	Service Returned for Defendant Keough & Sweeney, Ltd.: Service through person in charge / agent;	20	 Image	#13
43	05/27/2016	Service Returned for Defendant Keough, Esq., Sean P: Service through person in charge / agent;	21	 Image	#14
44	05/27/2016	Service Returned for Defendant Couture, Esq., Michael: Service through person in charge / agent;	22	 Image	#15
45	05/27/2016	Service Returned for Defendant Winston Law Group, LLC: Service through person in charge / agent;	23	 Image	#16
46	05/27/2016	Service Returned for Defendant Sweeney, II, Esq., Jerome V: Service through person in charge / agent;	24	 Image	#17
47	05/27/2016	Service Returned for Defendant Attorney Neal Winston, individually and in his capacity as Registered Agent of Winston Law Group, LLC: Service through person in charge / agent;	25	 Image	#18
48	05/27/2016	Service Returned for Defendant Jerome V Sweeney, III, Esq. Individually and in his/her Capacity As Registered Agent of Keough & Sweeney, Ltd.: Service through person in charge / agent;	26	 Image	#19
49	05/27/2016	Service Returned for Defendant Falvey, Brian: Service made in hand;	27	 Image	#20
50	05/27/2016	Service Returned for Defendant The Law Office of Deborah Masterson: Service through person in charge / agent;	28	 Image	#21
51	05/27/2016	Service Returned for Defendant Deborah Masterson, Esq. Individually and in his/her Capacity As Owner of The Law Office of Deborah Masterson: Service made in hand;	29	 Image	#22
52	05/27/2016	Service Returned for Defendant Althena Health Care Systems MA III LLC Doing Business as Marlborough Hills Healthcare Center: Service through person in charge / agent;	30	 Image	#23
53	05/27/2016	Service Returned for Defendant A.A. Dority Company, Inc.: Service through person in charge / agent;	31	 Image	#24
54	05/27/2016	Service Returned for Defendant Crawford, Jeffrey W: Service made in hand;	32	 Image	#25
55	05/27/2016	Service Returned for Defendant Mirick, Esq., John O: Service made in hand;	33	 Image	#26
56	05/27/2016	Service Returned for Defendant Delcid, Donna: Service made at last and usual;	34	 Image	#27
57	05/27/2016	Service Returned for Defendant Port, Esq., Jason A: Service made in hand;	35	 Image	#28
58	05/27/2016	Service Returned for Defendant Matovu, Sauda: Service made at last and usual;	36	 Image	#29
59	05/27/2016	Service Returned for Defendant Mirick O'Connell DiMallie & Lougee LLP: Service through person in charge / agent;	37	 Image	#30
60	05/27/2016	Service Returned for Defendant Edwards, Andrea B: Service made in hand;	38	 Image	#31
61	05/27/2016	Service Returned for Defendant Speroni, Karen: Service made at last and usual;	39	 Image	#32
62	05/27/2016	Service Returned for Defendant Williams, Nancy J: Service made at last and usual;	40	 Image	#33

	Docket Date	Docket Text	File Ref Nbr.	Image Avail.	
63	05/27/2016	Service Returned for Defendant Walkuski, Thomas: Service made at last and usual;	41	 Image	#34
64	05/27/2016	Service Returned for Defendant Mosier, Michael: Service through person in charge / agent;	42	 Image	#35
65	05/27/2016	Service Returned for Defendant Curtis, Diane: Service through person in charge / agent;	43	 Image	#36
66	05/27/2016	Service Returned for Defendant Diehl, Kevin: Service through person in charge / agent;	44	 Image	#37
67	05/27/2016	Service Returned for Defendant Santilli, Lawrence: Service made in hand;	45	 Image	#38
68	05/27/2016	Service Returned for Defendant Chakalos-Santilli, Valerie: Service made in hand;	46	 Image	#39
69	05/27/2016	Service Returned for Defendant Soucey, Debra M: Service made in hand;	47	 Image	#40
70	05/27/2016	Service Returned for Defendant Petrucelli, Karen: Service made in hand;	48	 Image	#41
71	05/27/2016	Service Returned for Defendant Bove, James: Service made at last and usual;	49	 Image	#42
72	05/27/2016	Service Returned for Defendant Thomas Moylan, Esq. Individually and in his/her Capacity As Registered Agent of Plourde Bogue Moylan & Marino LLP: Service made at last and usual;	50	 Image	#43
73	05/27/2016	Plaintiff Sarah A Oulton's EMERGENCY, EX PARTE Motion to extend the deadline by which service of process must be made and request to serve remaining defendants by publication.	51		
74	05/27/2016	Affidavit filed by Plaintiff Sarah A Oulton in support of Plaintiff, Sarah A. Oulton's Third Emergency Ex parte motion to extend the deadline by which service of process must be made.	51.1		
75	05/27/2016	Service Returned for Defendant Dossantos, Laura: Service made in hand;	52	 Image	#44
76	05/27/2016	Service Returned for Defendant Walsh, Michael: Service made in hand;	53	 Image	#45
77	05/27/2016	Service Returned for Defendant Colonial Health Group-Westridge, LLC Doing Business as Marlborough Hills Healthcare Center: Service through person in charge / agent;	54	 Image	#46
78	05/27/2016	Service Returned for Defendant French, Christine: Service made at last and usual;	55	 Image	#47
79	05/27/2016	Service Returned for Defendant Piccioli, Paul R: Service made at last and usual;	56	 Image	#48
80	05/27/2016	Service Returned for Defendant Freedom Homes Realty: Service made at last and usual;	57	 Image	#49
81	05/27/2016	Service Returned for Defendant Joseph Everett Individually and in his/her Capacity As Registered Agent of John Everett & Sons Funeral Home: Service through person in charge / agent;	58	 Image	#50
82	05/27/2016	Service Returned for Defendant Simpson, Luke: Service through person in charge / agent;	59	 Image	#51
83	05/27/2016	Service Returned for Defendant Reeve, Maureen: Service through person in charge / agent;	60	 Image	#52
84	05/27/2016	Service Returned for Defendant Cunningham, Dennis: Service through person in charge / agent;	61	 Image	#53
85	05/27/2016	Service Returned for Defendant Davis, Susan: Service made in hand;	62	 Image	#54
86	05/27/2016	Service Returned for Defendant John Everett & Sons Funeral Home: Service through person in charge / agent;	63	 Image	#55
87	05/27/2016	Service Returned for Defendant Bracciale, Cynthia: Service made at last and usual;	64	 Image	#56
88	05/27/2016	Service Returned for Defendant Law Office of Philip C. Brown, Esq.: Service through person in charge / agent;	65	 Image	#57






	Docket Date	Docket Text	File Ref Nbr.	Image Avail.	
89	05/27/2016	Service Returned for Defendant Attorney Philip C. Brown, individually and in his capacity as owner of Law Office of Philip C. Brown Esq.: Service through person in charge / agent;	66	 Image	#58
90	05/27/2016	Service Returned for Defendant Attorney Dennis R. Brown individually and in his capacity as Registered Agent of Dennis R. Brown, P.C.: Service through person in charge / agent;	67	 Image	#59
91	05/27/2016	Service Returned for Defendant Brown, P.C., Dennis R: Service through person in charge / agent;	68	 Image	#60
92	05/31/2016	Endorsement on Motion to extend deadline for service of process and to serve by alternative means (publication) as to defendant Arthur Bergeron only. (#10.0): ALLOWED in part. Service deadline is extended to 6/30/16. Plaintiff has not attempted to serve defendant by leaving process at defendant's last and usual place of abode.-(Dated 5/27/2016) m. 5/31/2016			
93	06/02/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY Motion to extend time for service of process on four out-of-state defendants (1) Plourde Bogue Moylan & Marino, LLP (2) Attorney Thomas Moylan (3) Attorney Melissa Curley, and (4) Gina Queiros, by an additional thirty (30) days.	69		
94	06/02/2016	Affidavit filed by Plaintiff Sarah A Oulton in support of plaintiffs' emergency ex parte motion to enlarge time for service of process on four out-of-state defendants	69.1		
95	06/08/2016	Defendant Althena Health Care Systems MA III LLC Doing Business as Marlborough Hills Healthcare Center, James Bove, Valerie Chakalos-Santilli, Diane Curtis, Laura Dossantos, Michael Mosier, Karen Petrucelli, Lawrence Santilli, Debra M Soucey, Thomas Walkuski's Motion to extend time for a responsive pleading to amended complaint for ninety days until September 6, 2016.	70		
96	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Althena Health Care Systems MA III LLC Doing Business as Marlborough Hills Healthcare Center			
97	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant James Bove			
98	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Valerie Chakalos-Santilli			
99	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Diane Curtis			
100	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Kevin Diehl			
101	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Laura Dossantos			
102	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Michael Mosier			
103	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Karen Petrucelli			
104	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Lawrence Santilli			
105	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Debra M Soucey			
106	06/08/2016	Attorney appearance On this date Philip Messier, Esq. added as Private Counsel for Defendant Thomas Walkuski			
107	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Althena Health Care Systems MA III LLC Doing Business as Marlborough Hills Healthcare Center			
108	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant James Bove			
109	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Valerie Chakalos-Santilli			
110	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Diane Curtis			
111	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Kevin Diehl			
112	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Laura Dossantos			



	<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>
113	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Michael Mosier		
114	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Karen Petrucelli		
115	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Lawrence Santilli		
116	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Debra M Soucey		
117	06/08/2016	Attorney appearance On this date Joseph M. Desmond, Esq. added as Private Counsel for Defendant Thomas Walkuski		
118	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant John Everett & Sons Funeral Home	71	
119	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Joseph Everett Individually and in his/her Capacity As Registered Agent of John Everett & Sons Funeral Home	71	
120	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Dennis Cunningham	71	
121	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Susan Davis	71	
122	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Maureen Reeve	71	
123	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Brian Falvey	71	
124	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Luke Simpson	71	
125	06/08/2016	Attorney appearance On this date Jeffrey Lefferts McCormick, Esq. added for Defendant Richard Kelly	71	
126	06/08/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton's Stipulation to Extend the Deadline for defendants to file responsive pleadings to September 1, 2016. --Assented to.	72	
127	06/09/2016	Endorsement on Motion to extend the deadline by which service of process must be made and request to serve remaining defendants by publication. (#51.0): ALLOWED (EMERGENCY EX PARTE MOTION) (dated 05/27/16) (Mailed 06/09/16)		
128	06/09/2016	Endorsement on Motion to Enlarge Time for Service of Process on four out-of-state defendants' (#69.0): ALLOWED (EMERGENCY EX PARTE MOTION) (dated 06/03/16) (Mailed 06/09/16)		
129	06/10/2016	Endorsement on Stipulation to extend the deadline for defendants to file responsive pleading to September 1, 2016 (#72.0): ALLOWED		
130	06/10/2016	Endorsement on Motion of defendants Athena Health Care Systems MA III LLC d/b/a Marlborough Hills Healthcare Center, James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Laura Dossantos, Michael Mosier, Karen Petrucelli, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski to extend time for responsive pleading (#70.0): ALLOWED		
131	06/13/2016	Attorney appearance On this date Courtney A Longo, Esq. added for Defendant Dennis R Brown, P.C.	73	
132	06/13/2016	Attorney appearance On this date Kenneth B Walton, Esq. added as Private Counsel for Defendant Dennis R Brown, P.C.	73	
133	06/13/2016	Attorney appearance On this date Courtney A Longo, Esq. added as Private Counsel for Defendant Attorney Dennis R. Brown individually and in his capacity as Registered Agent of Dennis R. Brown, P.C.	73	
134	06/13/2016	Attorney appearance On this date Kenneth B Walton, Esq. added as Private Counsel for Defendant Attorney Dennis R. Brown individually and in his capacity as Registered Agent of Dennis R. Brown, P.C.	73	
135	06/13/2016	Defendant's Notice of intent to file motion motion to dismiss. Applies To: Brown, P.C., Dennis R (Defendant); Attorney Dennis R. Brown individually and in his capacity as Registered Agent of Dennis R. Brown, P.C. (Defendant)	73	
136	06/17/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion to enlarge time for re-service of process on eight defendants for additional 30 days.	74	


	Docket Date	Docket Text	File Ref Nbr.	Image Avail.	
137	06/17/2016	Affidavit of of Atty. Sarah A. Oulton in support of plaintiffs' emergency ex parte motion to enlarge time for re-Service of process on eight defendants.	74.1		
138	06/20/2016	Attorney appearance On this date Thomas J Moylan, Esq. added for Defendant Thomas Moylan, Esq. Individually and in his/her Capacity As Registered Agent of Plourde Bogue Moylan & Marino LLP	75		
139	06/20/2016	Attorney appearance On this date Thomas J Moylan, Esq. added for Defendant Melissa Curley, Esq.	75		
140	06/20/2016	Attorney appearance On this date Thomas J Moylan, Esq. added for Defendant Plourde Bogue Moylan & Marino LLP	75		
141	06/20/2016	Attorney appearance On this date Melissa L Curley, Esq. added for Defendant Thomas Moylan, Esq. Individually and in his/her Capacity As Registered Agent of Plourde Bogue Moylan & Marino LLP	76		
142	06/20/2016	Attorney appearance On this date Melissa L Curley, Esq. added for Defendant Melissa Curley, Esq.	76		
143	06/20/2016	Attorney appearance On this date Melissa L Curley, Esq. added for Defendant Plourde Bogue Moylan & Marino LLP	76		
144	06/27/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion to extend deadline for service of process on Arthur Bergeron and allow service by publication by additional 45 days.	77	 Image	#61
145	06/27/2016	Affidavit of Sarah A. Oulton in support of plaintiffs' emergency ex parte motion to extend deadline for service of process on Aurthur Bergeron and allow service by publication.	77.1		
146	06/27/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EX PARTE Motion to enlarge time for service of process by and additional 45 days for defendants, (1) James Bove (2) Vinay Kumar (3) John Kain, (4) Richard Kravetz and (5) Denise Stephenson.	78	 Image	#62
147	06/27/2016	Affidavit of Sarah A. Oulton in support of Plffs.' emergency ex parte motion to enlarge time for service of process by publication.	78.1		
148	06/27/2016	Summons, returned SERVED last and usual Applies To: Mantzoukas, William (Defendant)	78.2		
149	06/28/2016	Endorsement on Motion to Enlarge Time for Re-Service of Process on Eight Defendants (#74.0): ALLOWED			
150	06/29/2016	Endorsement on Motion to Extend Deadline for Service of Process on Arther Bergeron and to Allow Service by Publication (#77.0): ALLOWED			
151	06/29/2016	Endorsement on Motion to Enlarge Time for Service of Process by Publication (#78.0): ALLOWED			
152	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Colonial Health Group-Westridge, LLC Doing Business as Marlborough Hills Healthcare Center	79		
153	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Michael B Lincoln	79		
154	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Gina M Queiros	79		
155	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Andrea B Edwards	79		
156	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Donna Delcid	79		
157	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Karen Speroni	79		
158	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Christine French	79		
159	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Denise Stephenson	79		
160	06/30/2016	Attorney appearance On this date William J Fidoruko, Esq. added for Defendant Sauda Matovu	79		
161	07/01/2016	Service Returned for Defendant Queiros, Gina M: Service made at last and usual;	80	 Image	#63

	<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>	
162	07/01/2016	Service Returned for Defendant Curley, Esq., Melissa: Service made in hand;	81	 Image	#64
163	07/01/2016	Service Returned for Defendant Thomas Moylan, Esq. Individually and in his/her Capacity As Registered Agent of Plourde Bogue Moylan & Marino LLP: Service made in hand;	82	 Image	#65
164	07/01/2016	Service Returned for Defendant Plourde Bogue Moylan & Marino LLP: Service made at last and usual;	83	 Image	#66
165	07/01/2016	Attorney appearance On this date Harvey Weiner, Esq. added for Defendant Deborah Masterson, Esq. Individually and in his/her Capacity As Owner of The Law Office of Deborah Masterson	84		
166	07/01/2016	Attorney appearance On this date Barton Eugene Centauro, Esq. added for Defendant Deborah Masterson, Esq. Individually and in his/her Capacity As Owner of The Law Office of Deborah Masterson	84		
167	07/11/2016	ORDER: of notice by Publication issued as to James Bove in (Dorchester Reporter)	85	 Image	#67
168	07/11/2016	ORDER: of Notice by Publication issued as to Denise Stephenson in (Hudson Sun)	86	 Image	#68
169	07/11/2016	ORDER: of Notice by Publiction issued as to Richard Kravetz and John Kain in (Haverhill Gazette)	87	 Image	#69
170	07/11/2016	ORDER: of Notice by Publication issued as to Vinay Kumar, M.D. in the (Marlborough Enterprise)	88	 Image	#70
171	07/12/2016	ORDER: of Notice by Publication issued as to Attorney Arthur P. Bergeron in the (Worcester Telegram)	89	 Image	#71
172	07/26/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion to enlarge time for re-service of process on four out-of-state defendants.	90	 Image	#72
173	07/26/2016	Service Returned for Defendant Winston Law Group, LLC: Service through person in charge / agent;	91	 Image	#73
174	07/26/2016	Service Returned for Defendant Couture, Esq., Michael: Service through person in charge / agent;	92	 Image	#74
175	07/26/2016	Service Returned for Defendant Attorney Neal Winston, individually and in his capacity as Registered Agent of Winston Law Group, LLC: Service through person in charge / agent;	93	 Image	#75
176	07/26/2016	Service Returned for Defendant Sweeney, II, Esq., Jerome V: Service made at last and usual;	94	 Image	#76
177	07/27/2016	Endorsement on Motion to Enlarge the time for re-service of process on four out-of-state defendants (#90.0): ALLOWED			
178	08/01/2016	Defendant Colonial Health Group-Westridge, LLC Doing Business as Marlborough Hills Healthcare Center, Michael Walsh, William Mantzoukas, Richard Kravetz, John Kain, Michael B Lincoln, Gina M Queiros, Andrea B Edwards, Donna Delcid, Karen Speroni, Christine French, Denise Stephenson, Sauda Matovu, Vinay Kumar, M.D., Althena Health Care Systems MA III LLC Doing Business as Marlborough Hills Healthcare Center, James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Michael Mosier, Karen Petrucelli, Laura Dossantos, Lawrence Santilli, Debra M Soucey, Thomas Walkuski, John Everett & Sons Funeral Home, Joseph Everett Individually and in his/her Capacity As Registered Agent of John Everett & Sons Funeral Home, Dennis Cunningham, Susan Davis, Maureen Reeve, Brian Falvey, Luke Simpson, Richard Kelly's Assented to Motion to Transfer Case to Middlesex County.	95	 Image	#77
179	08/01/2016	Rule 9A list of documents filed. Applies To: Messier, Esq., Philip (Attorney) on behalf of Bove, James, Chakalos-Santilli, Valerie, Curtis, Diane, Diehl, Kevin, Mosier, Michael, Petrucelli, Karen, Soucey, Debra M, Walkuski, Thomas (Defendant)	95.2		
180	08/01/2016	Attorney appearance On this date William J Fidurko, Esq. added for Defendant Michael Walsh			
181	08/01/2016	Attorney appearance On this date William J Fidurko, Esq. added for Defendant William Mantzoukas			
182	08/01/2016	Attorney appearance On this date William J Fidurko, Esq. added for Defendant Richard Kravetz			
183	08/01/2016	Attorney appearance On this date William J Fidurko, Esq. added for Defendant John Kain			
184	08/01/2016	Attorney appearance On this date William J Fidurko, Esq. added for Defendant Vinay Kumar, M.D.			

**NOTE -
ALLEGEDLY
FRAUDULENT &
FORGED
MOTION TO
TRANSFER**

	<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>	
185	08/01/2016	Affidavit of compliance with Superior Court Rule 9A Applies To: Messier, Esq., Philip (Attorney) on behalf of Bove, James, Chakalos-Santilli, Valerie, Curtis, Diane, Diehl, Kevin, Mosier, Michael, Petrucelli, Karen, Santilli, Lawrence, Walkuski, Thomas (Defendant)	95.1		
186	08/03/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EX PARTE Motion to accept proof of service of process on four Out-of-State defendants by affidavits from the Rhode island Division of Sheriffs Re: 1.) Keough & Sweeney, Ltd. 2.) Attorney Jerome V. Sweeney III, 3.) Attorney Sean P. Keough, and 4.) Attorney Joseph A. Keough, Jr..	96	 Image	#78
187	08/03/2016	Affidavit of Sarah A. Oulton in support of Plaintiffs' ex parte motion to accept proof of service of process on four Out-Of-State Defendants by affidavits from the Rhode Island Division of Sheriffs.	96.1		
188	08/05/2016	Opposition to to Defendants motion to transfer case to Middlesex County (P#91) filed by Sarah A Oulton	97		
189	08/08/2016	Attorney appearance On this date Thomas Whitney Beliveau, Esq. added for Defendant Cynthia Bracciale	98		
190	08/08/2016	Attorney appearance On this date Stephen J Duggan, Esq. added for Defendant The Jowdy Group, Inc.	99		
191	08/08/2016	Attorney appearance On this date John William Chamberlain, Esq. added for Defendant The Jowdy Group, Inc.	99		
192	08/08/2016	Attorney appearance On this date Stephen J Duggan, Esq. added for Defendant Alexander R Jowdy	99		
193	08/08/2016	Attorney appearance On this date John William Chamberlain, Esq. added for Defendant Alexander R Jowdy	99		
194	08/10/2016	Endorsement on Motion to accept proof of service of process on four out of state defendants by affidavits from the Rhode Island Division of Sheriffs (Ex parte) (#96.0): ALLOWED (dated 8/4/2016) m. 8/11/2016			
195	08/10/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EX PARTE Motion to filed late returns of service on the four Keough & Sweeney - Rhode Island Defendants.	100	 Image	#79
196	08/10/2016	Affidavit filed by Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton in support of Plaintiffs' ex parte motion to file late returns of service on the four Keough & Sweeney - Rhode Island Defendants.	100.1		
197	08/10/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion to enlarge to Ocotber 1, 2016, the deadline for service of process by publication for defendant James Bove and to order publication in the Boston Herald Newspaper.	101	 Image	#80
198	08/10/2016	Affidavit of in support of plaintiffs' emergency ex parte motion to enlarge to October 1, 2016, the deadline for service of process by publication for the defendant James Bove, and to order publication in the Boston Herald Newspaper.	101.1		
199	08/10/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EX PARTE Motion to accept late filing of plaintiffs' opposition to defendants' motion to transfer case to Middlesex County. (#91)	102	 Image	#81
200	08/10/2016	Affidavit of in support of plaintiffs' ex parte motion to accept late filing of plaintiffs' opposition to defendants' motion to transfer case to Middlesex County.	102.1		
201	08/10/2016	Summons, returned SERVED Applies To: Keough & Sweeney, Ltd. (Defendant)	103		
202	08/10/2016	Summons, returned SERVED Applies To: Sweeney, II, Esq., Jerome V (Defendant)	104		
203	08/10/2016	Summons, returned SERVED Applies To: Keough, Esq., Sean P (Defendant)	105		
204	08/10/2016	Summons, returned SERVED Applies To: Keough, Jr., Esq., Joseph A (Defendant)	106		
205	08/12/2016	Order of Notice by Publication, returned SERVED (#89) Applies To: Bergeron, Esq., Arthur P (Defendant)		 Image	#82

	Docket Date	Docket Text	File Ref Nbr.	Image Avail.	
206	08/15/2016	Endorsement on Motion to file late returns of service on the four Keough, Sweeney-Rhode Island defendants (#100.0): ALLOWED (Dated 8/12/2016)			
207	08/15/2016	Endorsement on Motion to transfer case to Middlesex County (#91.0): ALLOWED After consideration of plaintiffs late filed oppositon. See order back of this page. (Dated 8/12/2016)			
208	08/15/2016	#86-Service Returned for Defendant Stephenson, Denise: Service made via publication;			
209	08/15/2016	#87-Service Returned for Defendant Kravetz, Richard: Service made via publication;			
210	08/15/2016	#88-Service Returned for Defendant Kumar, M.D., Vinay: Service made via publication;			
211	08/15/2016	Endorsement on Motion to accept late filing of plaintiffs opposition to defendants motion to transfer case to Middlesex County (#102.0): ALLOWED (Dated 8/12/2016)			
212	08/16/2016	Endorsement on Motion to enlarge to October 1, 2016, the deadline for service of process by publication for defendant James Bove and to order publication in the Boston Herald Newspaper. (#101.0): ALLOWED (dated 8/12/2016)			
213	08/22/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's Motion for reconsideration of order to Transfer case to Middlesex County. (#91)	107	 Image	#83
214	08/24/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion for late permission to file a 30-page long motion for reconsideration of order to transfer case to Middlesex County or, in the alternative, for permission to file an amended motion for reconsideration not exceeding 20 pages.	108	 Image	#84
215	08/24/2016	Affidavit of of Sarah A. Oulton in support of Plaintiffs' Emergency Ex parte motion for late permission to file a 30 page long motion for reconsideration of order to transfer case to Middlesex County or, in the alternative, for permission to file an Amended Motion for Reconsideration not exceeding 20 pages.	108.1		
216	08/24/2016	Endorsement on Motion for reconsideration of order to Transfer case to Middlesex County. (#107.0): DENIED for failure to comply with Rule 9A and substantively the grounds claimed do not warrant reconsideration. (dated 8/23/2016) m. 8/25/2017			
217	08/25/2016	Case transferred to another court. (Middlesex County)			
218	08/29/2016	Attorney appearance On this date Doyle C. Valley, Esq. added for Defendant Sean P Keough, Esq.	109		
219	08/29/2016	Attorney appearance On this date Jillian E. McGrath, Esq. added for Defendant Sean P Keough, Esq.	109		
220	08/29/2016	Attorney appearance On this date Doyle C. Valley, Esq. added for Defendant Joseph A Keough, Jr., Esq.	109		
221	08/29/2016	Attorney appearance On this date Jillian E. McGrath, Esq. added for Defendant Joseph A Keough, Jr., Esq.	109		
222	08/29/2016	Attorney appearance On this date Doyle C. Valley, Esq. added for Defendant Jerome V Sweeney, II, Esq.	109		
223	08/29/2016	Attorney appearance On this date Jillian E. McGrath, Esq. added for Defendant Jerome V Sweeney, II, Esq.	109		
224	08/29/2016	Attorney appearance On this date Doyle C. Valley, Esq. added for Defendant Jerome V Sweeney, III, Esq. Individually and in his/her Capacity As Registered Agent of Keough & Sweeney, Ltd.	109		
225	08/29/2016	Attorney appearance On this date Jillian E. McGrath, Esq. added for Defendant Jerome V Sweeney, III, Esq. Individually and in his/her Capacity As Registered Agent of Keough & Sweeney, Ltd.	109		
226	08/29/2016	Attorney appearance On this date Doyle C. Valley, Esq. added for Defendant Keough & Sweeney, Ltd.	109		
227	08/29/2016	Attorney appearance On this date Jillian E. McGrath, Esq. added for Defendant Keough & Sweeney, Ltd.	109		
228	08/31/2016	Plaintiff Sarah A Oulton, Sarah A Oulton on behalf of The Estate of Donald Paul Oulton, Sarah A Oulton on behalf of The Estate of Carol Jame Oulton's EMERGENCY, EX PARTE Motion to enlarge to November 1, 2016, the Deadline for service of Process by Publication for Defendant James Bove and to Order Publication in the Boston Herald Newspaper.	110		

	<u>Docket Date</u>	<u>Docket Text</u>	<u>File Ref Nbr.</u>	<u>Image Avail.</u>
229	08/31/2016	Affidavit of Sarah A. Oulton in support of plaintiffs' emergency ex parte motion to enlarge to Nov. 1, 2016, the deadline for service of process by publication for defendant James Bove and to order publication in the Boston Herald Newspaper.	110.1	
230	08/31/2016	Endorsement on Motion to enlarge to November 1, 2016, the deadline for service of process by publication for defendant James Bove and to order publication in the Boston Herald Newspaper. (#110.0): ALLOWED		
231	08/31/2016	ORDER: of notice by publication as to James Bove in the (Boston Herald) issued.	111	 Image
232	09/02/2016	Attorney appearance On this date David Denison Dishman, Esq. added for Defendant Andrew Hladick	112	
233	09/02/2016	Attorney appearance On this date David Denison Dishman, Esq. added for Defendant Nancy J Williams	112	
234	09/02/2016	Attorney appearance On this date David Denison Dishman, Esq. added for Defendant David P Oulton	112	
235	09/06/2016	Attorney appearance On this date Kevin John O'Connor, Esq. added for Defendant A.A. Dority Company, Inc.	113	
236	09/06/2016	Attorney appearance On this date David Denison Dishman, Esq. added for Defendant Carol B. Hladick	113	
237	09/06/2016	Attorney appearance On this date Kevin John O'Connor, Esq. added for Defendant Jeffrey W Crawford	113	
238	09/06/2016	Attorney appearance On this date Brian James OConnor, Esq. added for Defendant A.A. Dority Company, Inc.	114	
239	09/06/2016	Attorney appearance On this date Brian James OConnor, Esq. added for Defendant Jeffrey W Crawford	114	
240	09/06/2016	Defendant's Notice of intent to file motion Motion to dismiss Applies To: Deborah Masterson, Esq. Individually and in his/her Capacity As Owner of The Law Office of Deborah Masterson (Defendant); Hladick, Andrew (Defendant)	115	
241	09/06/2016	Defendant's Notice of intent to file motion motion to dismiss Applies To: Deborah Masterson, Esq. Individually and in his/her Capacity As Owner of The Law Office of Deborah Masterson (Defendant); Hladick, Andrew (Defendant)	116	

#85

Case Disposition

<u>Disposition</u>	<u>Date</u>	<u>Case Judge</u>
Transferred to another Court	08/25/2016	

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #01

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT

CIVIL ACTION NO. 1579CV00917

SARAH A. OULTON,

Plaintiff,

v.

CAROL B. HLADICK, et al.,

Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAR 17 2016


CLERK OF COURTS

**PLAINTIFF'S EMERGENCY *EX PARTE* MOTION TO REMOVE ACTION DUE TO
IMPROPER VENUE**

Pursuant to G.L. c. 223, § 15, Plaintiff Sarah A. Oulton ("Plaintiff"), by and through counsel, hereby moves this Court to order this action removed to the Superior Court of Middlesex County, where venue is proper. In support of this motion Plaintiff states that venue is properly laid in Middlesex County Superior Court for the following reasons.

1. During the course of amending Plaintiff's Verified Complaint and Demand for Jury Trial, a land action was added. The real property that is the subject of this action is situated in Middlesex County.
2. The matters of the decedents' estates are currently pending in the Middlesex County Probate and Family Court.
3. The Defendants' acts (from November 2011 through the present time) which gave rise to this lawsuit, as described in Plaintiff's Verified Complaint and Demand for Jury Trial, occurred primarily in Middlesex County.
4. Numerous Defendants and Defendant Corporations reside and/or have their principal places of business in Middlesex County.

5. During the course of the amendment of the Complaint, counts were added, including RICO violations. The proper venue for these additional counts is Middlesex County Superior Court.

6. None of the Defendants in this case has yet been served.

WHEREFORE Plaintiff requests that this Court issue an Order transferring this action from Hampden County to the Superior Court of Middlesex County.

Respectfully submitted,

PLAINTIFF, SARAH A. OULTON
BY AND THROUGH HER ATTORNEYS

By: Coreen Goodwin
Coreen Goodwin
BBO #693188
Law Office of Coreen Goodwin
64 Donbray Road
Springfield, MA 01119
Telephone: 413-519-2769
Email: AttorneyGoodwin@Yahoo.com

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #02

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton,
Plaintiff,

v.

Carol B. Hladick, et al,
Defendant.

HAMPDEN COUNTY
SUPERIOR COURT

FILED

APR 19 2016


CLERK OF COURTS

**PLAINTIFF SARAH A. OULTON'S SECOND EMERGENCY *EX PARTE* MOTION TO
EXTEND THE DEADLINE BY WHICH SERVICE OF PROCESS MUST BE MADE**

Now comes Plaintiff Sarah A. Oulton ("Plaintiff"), through counsel, pursuant to Mass. R. Civ. P. 6(b) and respectfully requests that this court enter an order extending the deadline by which service of process must be made by an additional 30 days. Before the 90 days within which service of the summons and complaint must be made under Mass. R. Civ. P. 4(j) or any period of extension beyond the 90 days previously allowed by the court, a party may obtain an enlargement of time upon a showing of cause. Mass. R. Civ. P. 6(b)(1). The trial judge is called upon to exercise discretion. See Giacobbe v. First Coolidge Corp., 367 Mass. 309, 317 (1975). No notice is required to be given to the other side and the extension may be granted without motion. Mass. R. Civ. P. 6(b)(1) Any harshness of the consequences to a plaintiff for failure to timely serve a defendant under Mass.R.Civ.P. 4(1) are mitigated by the liberal time extensions available to the plaintiff under Mass.R.Civ.P. 6(b) Carrigan, 45 Mass.App.Ct. At 312 (1998). As grounds for this Motion Plaintiff states the following:

1. Plaintiff filed her Verified Complaint and Demand for Jury Trial (the "Original

Complaint”) on December 24, 2015, in Hampden County Superior Court.

2. None of the Defendants has yet been served and none will be prejudiced by granting an additional 30-day extension of time by which service of process must be made.

3. Plaintiff’s counsel commenced work on this case in June 2015 and worked diligently to file the Original Complaint on December 24, 2015. Within mere days of filing the Original Complaint, however, Plaintiff’s counsel discovered new information that necessitated the immediate preparation of an Amended Verified Complaint and Demand for Jury Trial (the “Amended Complaint”) and consultation with additional experts.

4. As a result of the newly-discovered information, the Amended Complaint names a total of 66 Defendants and it also contains numerous additional facts, counts, and exhibits.

5. Since December 26, 2015, Plaintiff’s counsel diligently took all reasonable steps possible to incorporate the additional facts, counts, and exhibits into the Amended Complaint and to plead the facts with requisite particularity.

6. Plaintiff’s counsel consulted with experts in January and February and has worked diligently, throughout March and April, to incorporate all of the experts’ recommendations into the Amended Complaint.

7. On March 11, 2016, Plaintiff filed an Emergency *Ex Parte* Motion to Extend Deadline by Which Service of Process Must Be Made, and this court granted Plaintiff 30 days (i.e., until April 23, 2016) to serve process on the Defendants.

8. Notice of the court’s extension of the original deadline for service of process was given to all Defendants to the Original Complaint, pursuant to Massachusetts Superior Court Rule 9A.

9. Plaintiff’s counsel has, at all relevant times, acted in good faith and with diligence

necessary to amend the Original Complaint so that the Amended Complaint served on all 66 defendants will be as comprehensive and judicially economical as possible.

10. Since the first extension of time for service of process was granted on March 11, 2016, Plaintiff's counsel has been working between eight and 10 hours per day on this case, seven days per week (in addition to handling the rest of their case load), in a diligent attempt to serve all 66 Defendants by the April 23, 2016, deadline.

11. Plaintiff's counsel is certain that the Amended Complaint will be served within the deadline requested in this Motion.

12. The Amended Complaint constitutes a far more detailed and comprehensive account of the facts of this case and, moreover, the facts contained therein are pleaded with requisite particularity in the Amended Complaint. As a result of the vast improvements made to the Original Complaint, the Answers elicited by it should be far more appropriately responsive than the Answers elicited by the Original Complaint would have been.

13. In contrast, service of the Original Complaint, which is merely skeletal by comparison, would have confused the Defendants and the court, elicited incomplete Answers from the Defendants, and caused undue burden on Plaintiff, the Defendants, and this court. Had the Original Complaint been served on the Defendants, any Answers elicited would have constituted a waste of time for the Defendants and the court because the Amended Complaint bears such little resemblance to the Original Complaint. The Amended Complaint far more fully and clearly states the facts of the case and pleads those facts with the requisite particularity.

14. On April 14, 2016, in a related matter in the Middlesex County Probate and Family Court, Plaintiff's counsel filed a "Statement of Objections by Sarah A. Oulton, Objector, to the First and Final Account of Attorney Michael R. Couture, the Personal Representative."

15. Both of the Oultons' Probate cases, which form the basis of this lawsuit, have been open for more than three years and four months as a result of the Defendants' misconduct.

16. Plaintiff neither seeks to delay the instant case nor have it dismissed for any reason. Plaintiff is extremely motivated litigate this lawsuit as expeditiously as possible and Plaintiff's counsel are working as diligently as possible to make that happen.

17. This case has damaged Plaintiff tremendously and consumed every facet of Plaintiff's life since December 2011, the point at which Plaintiff's parents were falsely imprisoned and abused in Defendant Marlborough Hills Healthcare Center ("Marlborough Hills"). Plaintiff's law licensure has been delayed as she conducted research, monitored and contested the illegal actions of the Defendants in the Oultons' open Middlesex County Probate and Family Court cases, and as she sought counsel and experts to assist her in pursuing the claims in the instant action. Plaintiff is, therefore, highly motivated to have this case proceed as quickly as possible.

18. An additional 30-day extension of time for service of process under this Motion will permit the proper parties to be served with an Amended Complaint that contains all of the facts, counts, and exhibits necessary to adjudicate the instant matter in the most equitable and judicially economical manner possible. Moreover, it will not unfairly prejudice any party.

19. Plaintiff's counsel recently learned that on April 13, 2016, Defendant Attorney John Mirick ("Attorney Mirick") filed, on behalf of himself and co-defendants Attorney Jason Port, Attorney Arthur Bergeron, and Mirick O'Connell DeMallie & Lougee LLP (the "Mirick O'Connell Defendants") an unusual and premature "Opposition to Any Extension of Time" (the "Premature Opposition"), in which the Mirick O'Connell Defendants stated:

In the event that Ms. Oulton seeks a further extension of time,

Mirick O'Connell requests an opportunity to be heard in opposition.

20. A copy of the Premature Opposition is attached hereto as **Exhibit 1** and incorporated herein by reference.

21. This court should deny the Premature Opposition because it is not grounded in either fact or law.

22. Attorney Mirick's letter transmitting the Premature Opposition to the Hampden County Clerk of Court stated:

I request an opportunity to be heard in opposition to the motion. I am not certain that there is any recognized procedure to file an anticipatory Opposition, but I enclose an Opposition for your consideration. [emphasis added]

23. Neither Mass. R. Civ. P. 6(b) nor any other Massachusetts Rule of Civil Procedure permits a defendant to preempt the court's granting a motion for an extension of time for service of process with an "anticipatory opposition," particularly when – as in the instant case – the plaintiff can show cause for the delay in serving process and can demonstrate a need for the extension of time after making a diligent and good-faith effort to comply with a previously-set deadline.

24. Similarly, the Premature Opposition is not grounded in fact. The Premature Opposition is replete with falsehoods, all of which are fully addressed and pleaded with particularity in the Amended Complaint to be filed and served as soon as possible.

25. For example, Mirick O'Connell was not, as Attorney Mirick falsely stated in the Premature Opposition, "engaged by the Oulton Parents" to "successfully oppose" the Petitions for Conservator that Plaintiff filed in Middlesex County Probate and Family Court "in February 2012."

26. Instead, on January 23, 2012, Plaintiff filed Petitions for Conservator for the protection of her incapacitated elderly parents after the staff of Marlborough Hills administered a coma-inducing overdose on Carol on November 30, 2011, falsely imprisoned both Oultons in mid-December 2011, and unlawfully banned Plaintiff from the Oultons' lives on December 25, 2011.

27. In a letter to Plaintiff's counsel attached hereto as **Exhibit 2** and incorporated herein by reference, the attorneys retained by Marlborough Hills in the instant case informed Plaintiff's counsel that Mirick O'Connell was retained not by the elderly Oultons but by the administrators of Marlborough Hills, the very facility whose staff overdosed Carol and falsely imprisoned both Oultons for the last year of their lives. The relevant portion of the letter appears below:

TUCKER, SALTZMAN, DYER & O'CONNELL, LLP

50 CONGRESS STREET
BOSTON, MASSACHUSETTS 02109
617-986-6220
www.tsd-lawfirm.com

SCOTT J. TUCKER
PAUL SALTZMAN *
JAMES R. DYER
BRIAN A. O'CONNELL *
SCOTT H. KREMER
WILLIAM P. MCGOVERN, Jr.
MATTHEW E. MANTALOS
WILLIAM J. FIDURKO
NICOLE M. MELMAN

FAX 617-986-6229
*Also admitted in RI

fidurko@tsd-lawfirm.com
Direct 617-986-6226

July 23, 2015

CERTIFIED MAIL - RRR
& EMAIL: AttorneyGoodwin@yahoo.com

Coreen Goodwin, Esquire
64 Donbray Street
Springfield, MA 01119

Re: Sarah Oulton's "Demand Pursuant to M.G.L. Chapter 93A"

Dear Attorney Goodwin:

This office represents Colonial Health Westridge, LLC ("Colonial"), the former owner of Marlborough Healthcare Center ("Marlborough Hills"), and individuals currently or formerly associated with Marlborough (including Michael Lincoln, Michael Walsh, Christine French, Karen Spironi, Andrea Edwards, Donna Delcid, and Denise Stephenson), to which and to whom you directed letters dated June 19, 2015, purporting to be demands for relief under Massachusetts General Laws Chapter 93A.

....

unfounded. As you acknowledge in your letter, the subject of the Oultons' assets was adjudicated in a prior judicial proceeding, in which Marlborough Hills engaged counsel for the Oultons. To the extent your client is unhappy with the result of that proceeding, her cause of action is not against Marlborough Hills or our clients.

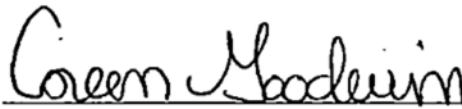
28. The deadline for service of process is two days away. Because of this, notice to the parties is unreasonable and an *ex parte* motion for an extension should be granted. Plaintiff respectfully requests that this court enter an order extending the deadline by which service of process must be made by an additional 30 days.

WHEREFORE, Plaintiff respectfully requests that this court issue an Order granting Plaintiff an addition 30 days by which service of process must be made.

Dated: April 19, 2016

Respectfully submitted,

PLAINTIFF SARAH A. OULTON
BY AND THROUGH HER ATTORNEY

A handwritten signature in cursive script, reading "Coreen Goodwin", written over a horizontal line.

Coreen Goodwin
BBO No. 693188
64 Donbray Road
Springfield, MA 01119
Telephone: 413- 241-1004
Email: AttorneyGoodwin@yahoo.com

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #03

SARAH A. OULTON, et al
CAROL B. Hladick, et al
HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

COMMONWEALTH of MASSACHUSETTS
SUPERIOR COURT DEPARTMENT

HAMPDEN CLERK OF COURTS

DOCKET NO. 1579cv00917

EMERGENCY EX PARTE MOTION TO EXTEND DEADLINE FOR SERVICE OF PROCESS AND TO SERVE BY
ALTERNATE MEANS (PUBLICATION) AS TO DEFENDANT ARTHUR BERGERON ONLY

As Grounds for this motion Plaintiff states the following;

1. Today is the deadline to effect service of process. All defendants have been served that could be located except Defendant Arthur Bergeron.
2. On May 23, 2016 Worcester County Deputy Sheriff Derry, attempted to serve Arthur Bergeron at 1800 West Park Drive Suite 400, The Law Firm of Mirick O'Connell, where Attorney Bergeron is listed as of counsel. Upon the Deputy's arrival, Attorney Bergeron's legal assistant phoned Arthur Bergeron and reported to the deputy that she was not allowed to sign for the complaint, per Arthur Bergeron.
3. Plaintiff then attempted to serve Defendant Arthur Bergeron, through his counsel, Attorney John Mirick at the Law Firm of Mirick O'Connell at 100 Front Street Worcester, Mass. Attorney John Mirick has entered a notice of appearance on behalf of Defendant Arthur Bergeron in this matter. Service was also refused by his counsel at this address.
4. The Worcester County Sheriff's have provided a statement that service was refused at both offices of The Law Firm of Mirick O'Connell (See Attached).
5. The Worcester County Sheriff's Office will reattempt to serve Defendant Arthur Bergeron at the Law Firm of Mirick O'Connell in Westborough and if service is refused the sheriff will leave the complaint at Arthur Bergeron's last and usual place of abode.
6. Today is also the funeral of Officer Ronald Tarentino, which is occurring in the Worcester area. Due to the traffic of that funeral it is unlikely that service will be effected on Defendant Arthur Bergeron by today.

Plaintiff respectfully requests that this court enter an order extending the deadline to effect service on Arthur Bergeron and enter an order permitting Plaintiff to serve Defendant Attorney Arthur Bergeron by publication.

Respectfully Submitted,
Plaintiff Sarah Oulton
By and through her counsel

Coreen Goodwin
Coreen Goodwin
64 Danbury Rd.
Springfield, MA

01119

BBO# 64318A



COMMONWEALTH OF MASSACHUSETTS
WORCESTER COUNTY SHERIFF
CIVIL PROCESS DIVISION INC

PLEASE REMIT TO: PO BOX 1066 Worcester, MA 01613-1066

Lewis G. Evangelidis
Sheriff

Lynn Trudel
Chief Deputy Sheriff

civilprocess.com

Invoice For Service: SUMMONS AND COMPLAINT

COREEN GOODWIN, ESQ
64 DONBRAY ROAD
SPRINGFIELD MA 01562



413-686-7777

Ref:

Balance: \$ 15.00
Invoice Number: 16010366
Invoice Date: 05/24/2016

RETURN UPPER PORTION OF INVOICE WITH PAYMENT WITHIN 30 DAYS!!!!!!

SARAH A. OULTON VS ARTHUR BERGERON

Docket Number: 1579CV00917

PERSON(S) SERVED & METHOD	DATE	TIME	SERVED BY
ARTHUR BERGERON	05/23/2016	11:30 am	Derry

OTHER, see below

SERVICE WAS REFUSED AT THE WESTBOROUGH ADDRESS & THEN REFUSED AGAIN AT THE WORCESTER LAW OFFICE

FEES	AMOUNT
Office Expense	15.00
Total Cost	15.00

Total - Invoice Number 16010366

Balance Due: \$15.00

Invoice For Service: SUMMONS AND COMPLAINT

PO BOX 1066 Worcester, MA 01613

TEL 508 752 1100 / 800 842 0083 FAX 508 752 3588

Ashburnham Athol Auburn Baldwinville Barre Berlin Blackstone Bolton Boylston Brookfield Charlton Charlton City Cherry Valley Clinton Douglas Dudley East Brookfield East Douglas Fiskdale Fitchburg Gardner Gilbertville Grafton Hardwick
Harvard Halden Hopedale Hubbardston Jefferson Lancaster Leicester Leominster Linwood Lunenburg Manchaug Mendon Milford Millbury Millville Morningdale New Braintree Northboro Northbridge North Brookfield North Oxford
North Uxbridge Oakdale Oakham Otter River Oxford Paxton Petersham Phillipston Princeton Rochdale Royalston Rutland Shrewsbury Southborough Southbridge Spencer Sterling Sturbridge Sutton Templeton Upton Uxbridge Warren
Waterville Webster Westboro West Boylston West Brookfield Westminster West Warren Whitinsville Wilkonsonville Winchendon Worcester

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #04

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
~~TORT~~ MOTOR VEHICLE TORT CONTRACT ~~EQUITABLE RELIEF~~ ~~OTHER~~

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CN00917

SARAH A. OULTON


CLERK OF COURTS

PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Carol Hladick

You are hereby summoned and required to serve upon ATTORNEY COREEN GORDWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 0119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.



Norfolk County Sheriff's Office, P.O. Box 699245, Quincy, MA 02269 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 1:11 PM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of Carol Hladick, 20 Causeway Street Medway, MA 02053 Travel (\$16.00) Travel (\$1.44) Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Total: \$47.94

Deputy Sheriff Joan Geer

Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(
(
(

, 20

2016 MAY 27 A 11:09

CLERKS OFFICE
SUPERIOR COURT
NORFOLK COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #05

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:

TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL D. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Joseph Keough

You are hereby summoned and required to serve upon ATTORNEY JACOBEN COOAWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Joseph Keough, at 250 Summer Street Morrison Mahoney Boston, MA . Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Travel (\$25.10) Total: \$61.10

Deputy Sheriff Richard Kennefick

Richard Kennefick

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(
(, 20)
()

CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #06

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON


CLERK OF COURTS

, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL, DEFENDANT(S)

To the above named defendant:

Andy Hladick

You are hereby summoned and required to serve upon ATTORNEY CORSEN GEORGIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Norfolk County Sheriff's Office, P.O. Box 699245, Quincy, MA 02269 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 1:11 PM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of Andy Hladick, 20 Causeway Street Medway, MA 02053 Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Total: \$26.00

A handwritten signature in cursive script, appearing to read "Joan Geer".

Deputy Sheriff Joan Geer

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
NORFOLK COUNTY

2016 MAY 27 A 11:09

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #07

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:

TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016

SUPERIOR COURT

DEPARTMENT OF THE TRIAL COURT

CIVIL ACTION NO.

1579 CV 0017

SARAH A. OULTON

Laura S. Gentile
CLERK OF COURTS

PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL. DEFENDANT(S)

To the above named defendant:

David Oulton

You are hereby summoned and required to serve upon ATTORNEY COREEN GOA WIN plaintiff's attorney, whose address is 64 DONBRAY ROAD SPRINGFIELD, MA 01119 an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.

Laura S. Gentile

Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1



Norfolk County Sheriff's Office, P.O. Box 699245, Quincy, MA 02269 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 1:33 PM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of David Oulton, 61 Crescent Street Franklin, MA 02038 Travel (\$16.00) Travel (\$2.70) Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Total: \$49.20

Deputy Sheriff Joan Geer

Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 MAY 27 A 11:09
CLERK'S OFFICE
SUPERIOR COURT
AMPOEN COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #08

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CN 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HADICK, ET AL., DEFENDANT(S)

To the above named defendant: Michael Lincoln

You are hereby summoned and required to serve upon ATTORNEY COREEN GERWIN, plaintiff's attorney, whose address is 64 SONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

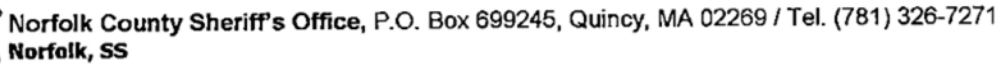
NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



May 25, 2016

I hereby certify and return that on 5/24/2016 at 5:32 PM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of Michael Lincoln, 12 Howard AV Foxboro, MA Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Travel (\$16.00) Travel (\$2.52) Total: \$49.02

offhand

Deputy Sheriff Alfred Wood, Jr.

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE
ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SAPPHIRE COUNTY

2016 MAY 27 A 11:09

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #09

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK, ET AL., DEFENDANT(S)


To the above named defendant:

Jowdy Group

You are hereby summoned and required to serve upon ATTORNEY GREEN GOODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #10

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

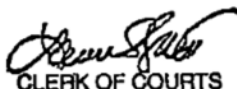
HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANCK, ET AL., DEFENDANT(S)

To the above named defendant:

Richard Kelly

You are hereby summoned and required to serve upon ATTORNEY GREEN BOSWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.




Norfolk County Sheriff's Office, P.O. Box 699245, Quincy, MA 02269 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 11:30 AM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of Richard Kelly, 477 Washington Street Wellesley, MA 02481 Travel (\$16.00) Travel (\$6.72) Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Total: \$53.22

Deputy Sheriff James Riggs


Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 A 11:09

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #11

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)


To the above named defendant:

Alex Joudy

You are hereby summoned and required to serve upon ATTORNEY COREN GOSWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Norfolk County Sheriff's Office, P.O. Box 699245, Quincy, MA 02269 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 12:51 PM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by leaving at the last and usual place of abode of Alex Jowdy, 16 Pleasant Street Medfield, MA 02052 Travel (\$16.00) Travel (\$1.44) Attestation - 1 Copy (\$5.00) Basic Service Fee (\$20.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Total: \$47.94

A handwritten signature in black ink, appearing to read "James Riggs".
Deputy Sheriff

Deputy Sheriff James Riggs

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERK'S OFFICE
SUPERIOR COURT
NORFOLK COUNTY

2016 MAY 27 A 11:09

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #12

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:

TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON


CLERK OF COURTS

PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK, ET AL. DEFENDANT(S)

To the above named defendant:

Lisa Vecchio

You are hereby summoned and required to serve upon ATTORNEY CORSEY GREENWIN
plaintiff's attorney, whose address is 64 MONROE ROAD, SPRINGFIELD, MA 01119
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1



Norfolk County Sheriff's Office, P.O. Box 859215, Braintree, MA 02185-9215 / Tel. (781) 326-7271
Norfolk, SS

May 26, 2016

I hereby certify and return that on 5/25/2016 at 11:58 AM I served a true and attested copy of the summons, amended complaint and exhibits in this action in the following manner: To wit, by delivering in hand to Lisa Vecchio at 888 Worcester Street Suite 200 Wellesley, MA 02481 . Travel (\$16.00) Travel (\$1.80) Attestation - 1 Copy (\$5.00) Basic Service Fee (\$30.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Total: \$58.30

Deputy Sheriff James Riggs


Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
NORFOLK COUNTY

2016 MAY 27 A 11:09

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #13

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLAADICK ET AL., DEFENDANT(S)

To the above named defendant:

Keough + Sweeney LTD

You are hereby summoned and required to serve upon ATTORNEY COREEN ADAMS WIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Keough & Sweeney LTD, at Morrison Mahoney 250 Summer Street Boston, MA. Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Richard Kennefick

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:26

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #14

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT - CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT

DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK, ET AL., DEFENDANT(S)

To the above named defendant:

Sean Keough

You are hereby summoned and required to serve upon ATTORNEY LOREEN COOAWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Sean Keough, at 250 Summer Street Morrison Mahoney Boston, MA . Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Richard Kennefick
Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(_____)
(_____, 20 _____)
(_____)

CLERKS OFFICE
SUPERIOR COURT
CAMDEN COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #15


TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Michael Couture

You are hereby summoned and required to serve upon ATTORNEY CORSEN COOLWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, ~~by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Michael Couture, at Morrison Mahoney 250 Summer Street c/o Attorney Gallagher Boston, MA .~~ Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Richard Kennefick
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:26

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #16

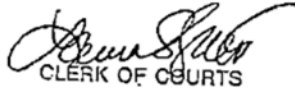
TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL, DEFENDANT(S)

To the above named defendant: Winston Law Group

You are hereby summoned and required to serve upon ATTORNEY CORREEN GOODWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, ~~by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Winston Law Group, at Morrison Mahoney 250 Summer Street Boston, MA . Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00~~

Deputy Sheriff Richard Kennefick

Richard Kennefick

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:27

23

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #17


TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
(TORT) MOTOR VEHICLE TORT (CONTRACT) (EQUITABLE RELIEF) (OTHER)

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED
MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Jerome Sweeney II

You are hereby summoned and required to serve upon ATTORNEY COREEN GEORWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01109, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Jerome Sweeney II, at 250 Summer Street Morrison Mahoney Boston, MA. Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Richard Kennefick
Deputy Sheriff

Date: _____

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:27

45

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #18

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLASICK, ET AL., DEFENDANT(S)

To the above named defendant:

Neal Winston

You are hereby summoned and required to serve upon ATTORNEY CORREEN GEDAWIN, plaintiff's attorney, whose address is 64 ANSBRY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for Neal Winston, at Morrison Mahoney 250 Summer Street Boston, MA . Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Richard Kennefick

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
DAMPDEN COUNTY

2016 MAY 27 A 10:27

25

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #19

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Jerome Sweeney III

You are hereby summoned and required to serve upon ATTORNEY COREEN GEDWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19th day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 26, 2016

I hereby certify and return that on 5/26/2016 at 8:00 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Angie Moise, Receptionist, agent and person in charge at the time of service for James Sweeney III, at Morrison Mahoney 250 Summer Street Boston, MA. Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Deputy Sheriff Richard Kennefick

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 MAY 27 A 10:27
CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2/5

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #20

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 W 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANICK, ET AL, DEFENDANT(S)

To the above named defendant:

Brian Falvey

You are hereby summoned and required to serve upon ATTORNEY COREEN GOODWIN, plaintiff's attorney, whose address is 64 SONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171
Middlesex, ss.

I hereby certify and return that on 5/24/2016 at 1:00 PM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT AND EXHIBITS AND AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to BRIAN FALVEY at @ FUNERAL HOME, BREZNAK RODMAN FUNERAL DIRECTORS 1251 WASHINGTON STREET West Newton, MA 02465 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$24.32) Conveyance (\$1.80) Total: \$62.12

May 24, 2016

John F. Kennedy

Deputy Sheriff

Dated: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 A 10:27

160120200

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #21

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

Laura S. Gentile
CLERK OF COURTS

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLASICK, ET AL., DEFENDANT(S)

To the above named defendant: Law Office of Deborah Masterson

You are hereby summoned and required to serve upon ATTORNEY CORSEAN GOODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.

Laura S. Gentile
Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171

Middlesex, ss.

May 24, 2016

I hereby certify and return that on 5/24/2016 at 10:56 AM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT AND EXHIBITS AND AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to DEBORAH MASTERSON, agent, person in charge at the time of service for LAW OFFICE OF DEBORAH MASTERSON, at 675 MASSACHUSETTS AVE, 5TH FLOOR Cambridge, MA 02139 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Total: \$36.00

Michael A. Doherty

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
CAMDEN COUNTY

2016 MAY 27 A 10:27

1/10/12/2014

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #22

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS
HAMPCEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 W 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Deborah Masterson

You are hereby summoned and required to serve upon ATTORNEY CORREN GOODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171

Middlesex, ss.

May 24, 2016

I hereby certify and return that on 5/24/2016 at 10:56 AM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT AND EXHIBITS AND AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to DEBORAH MASTERSON, agent, person in charge at the time of service for DEBORAH MASTERSON, at @ LAW OFFICE OF DEBORAH MASTERSON 675 MASSACHUSETTS AVE, 5TH FLOOR Cambridge, MA 02139 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$24.62) Conveyance (\$0.60) Total: \$61.22

A handwritten signature in black ink, appearing to read "Michael A. Dwyer".

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 A-10:27

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #23

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

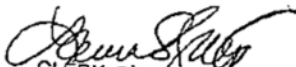
HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV. 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

v.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Athena Healthcare Systems

You are hereby summoned and required to serve upon ATTORNEY CORSEN GOODWIN, plaintiff's attorney, whose address is 64 BONDARY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



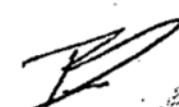
Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 24, 2016

I hereby certify and return that on 5/24/2016 at 11:13 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: ~~To wit, by delivering in hand to David Sullivan, Esq., agent and person in charge at the time of service for Athena Healthcare Systems, at MCREO Service Corp. 99 High Street 20th Floor Boston, MA 02110 .~~ Attest/Copies (\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Travel (\$25.10) Total: \$61.10

Deputy Sheriff Robert Foscaldo


Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 MAY 27 A 10:28
CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

08

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #24

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
(TORT) MOTOR VEHICLE TORT (CONTRACT) (EQUITABLE RELIEF) (OTHER)

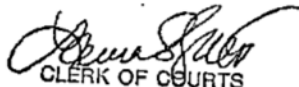
COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

A.A. DORITY

You are hereby summoned and required to serve upon ATTORNEY LOREEN GERAWIN, plaintiff's attorney, whose address is 64 MONDAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 24, 2016

I hereby certify and return that on 5/25/2016 at 11:48 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Richard Crumford, agent and person in charge at the time of service for A.A. Dority, at 262 Washington Street Suite 99 Boston, MA. Attest/Copies--(\$5.00) Basic Service Fee (IH) (\$30.00) Postage and Handling (\$1.00) Travel (\$25.10) Total: \$61.10

Deputy Sheriff Robert Foscaldo


Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
SUFFOLK COUNTY

2016 MAY 27 A 10:30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #25

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

Laura S. Gentile
CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00117

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANICK, ET AL., DEFENDANT(S)

To the above named defendant:

Jeffrey Crawford

You are hereby summoned and required to serve upon ATTORNEY LOREEN GOODWIN,
plaintiff's attorney, whose address is 64 DONRAY ROAD, SPRINGFIELD, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.

Laura S. Gentile


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

Suffolk, ss.

I hereby certify and return that on 5/25/2016 at 11:48 AM I served a true and attested copy of the Summons and Verified Complaint, Amended Verified Complaint & Exhibits in this action in the following manner: To wit, by delivering in hand to Jeff Crawford, agent and person in charge at the time of service for Jeffrey Crawford, at 262 Washington Street Suite 99 Boston, MA . Attest/Copies (\$5.00) Basic Service Fee (IH) ~~(\$30.00)~~ Postage and Handling ~~(\$1.00)~~ Total: \$36.00 - - - - -


Deputy Sheriff

DATE: _____, 20____

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE
ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMPHDEN COUNTY

ZBIB MAY 27 A 10:30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #26

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL, DEFENDANT(S)

To the above named defendant: John Mirick

You are hereby summoned and required to serve upon ATTORNEY COREEN GEOWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

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dant, in the

5/24/2016

I hereby certify and return that on 5/23/2016 at 12:14 PM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by delivering in hand to JOHN MIRICK at 100 FRONT STREET WORCESTER, MA 01604 . Service Fee (\$30.00) Attest (\$5.00) Mileage (\$22.46) Mailing (\$1) (\$1.00) Conveyance (\$2.00) Total: \$60.46

Steven Trotter

Steven Trotter
Deputy Sheriff

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CLERKS OFFICE
SUPERIOR COURT
HAMPSHIRE COUNTY

2016 MAY 27 A 10:30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #27

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, ET AL., PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Donna Deid

You are hereby summoned and required to serve upon ATTORNEY GOREN GOODWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

34

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

5/24/2016

I hereby certify and return that after attempting personal service on 5/23/2016 at 11:20 AM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of DONNA DELCID at 26 WASHBURN STREET NORTHBOROUGH, MA 01532 . Service Fee (\$20.00) Attest (\$5.00) Mileage (\$23.00) Mailing (\$1) (\$1.00) Conveyance (\$4.50) Total: \$53.50

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Kevin Derry
Deputy Sheriff

Date: _____, 20

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 A 10:30

40

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #28

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL, DEFENDANT(S)

To the above named defendant: Jason Port

You are hereby summoned and required to serve upon ATTORNEY CORREEN GEOSWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

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dant, in the

5/24/2016

I hereby certify and return that on 5/23/2016 at 12:14 PM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by delivering in hand to JASON PORT at 100 FRONT STREET WORCESTER, MA 01604 . Service Fee (\$30.00) Attest (\$5.00) Mailing (\$1) (\$1.00) Total: \$36.00

A handwritten signature in cursive script, reading "Steven Trottier".

Steven Trottier
Deputy Sheriff

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CLERKS OFFICE
SUPERIOR COURT
WORCESTER COUNTY

2016 MAY 27 A 10:30

23

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #29

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL, DEFENDANT(S)

To the above named defendant:

Sanda Natovu

You are hereby summoned and required to serve upon ATTORNEY CORSEN EGDWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

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5/24/2016

I hereby certify and return that after attempting personal service on 5/23/2016 at 3:45 PM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of SAUDA MATOVU at 15 HOUGHTON STREET #9 WORCESTER, MA 01604 . Service Fee (\$20.00) Attest (\$5.00) Mileage (\$22.46) Mailing (\$1) (\$1.00) Conveyance (\$2.00) Total: \$50.46

Steven Trottier

Steven Trottier
Deputy Sheriff

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 A 10:30

28

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #30

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HADICK, ET AL., DEFENDANT(S)

To the above named defendant: Mirick O'Connell Dimallie and Lougee

You are hereby summoned and required to serve upon ATTORNEY CORSEEN GODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

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I hereby certify and return that on 5/23/2016 at 12:16 PM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by delivering in hand to JOHN MIRICK, , agent, person in charge at the time of service for MIRICK O'CONNELL DIMALLIE AND LOUGEE at 100 FRONT STREET WORCESTER, MA 01608-1477 . Service Fee (\$30.00) Attest (\$5.00) Mailing (\$1) (\$1.00) Total: \$36.00

Steven Trottier
Deputy Sheriff

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CLERKS OFFICE
SUPERIOR COURT
WORCESTER COUNTY

2016 MAY 27 A 10:30

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #31

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CN 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Andrea Edwards

You are hereby summoned and required to serve upon ATTORNEY CORSEEN CROWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

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5/25/2016

I hereby certify and return that on 5/24/2016 at 1:25 PM I served a true and attested copy of the SUMMONS AND COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by delivering in hand to ANDREA EDWARDS at 1199 JOHN FITCH HIGHWAY FITCHBURG, MA 01420 . Service Fee (\$20.00) Attest (\$5.00) Mileage (\$23.66) Mailing (\$1) (\$1.00) Conveyance (\$4.50) Total: \$54.16

Gregory Carr

Gregory Carr
Deputy Sheriff

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ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
WORCESTER COUNTY

2016 MAY 27 A 10:30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #32

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
(TORT) MOTOR VEHICLE TORT (CONTRACT) (EQUITABLE RELIEF) (OTHER)

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK, ET AL., DEFENDANT(S)

To the above named defendant: Karen Speroni

You are hereby summoned and required to serve upon ATTORNEY CUREN EGDWIN plaintiff's attorney, whose address is 64 INARAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19th day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

5/24/2016

I hereby certify and return that after attempting personal service on 5/23/2016 at 10:38 AM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of KAREN SPERONI at 19 JOHN DRIVE RUTLAND, MA 01543 . Service Fee (\$20.00) Attest (\$5.00) Mileage (\$22.08) Mailing (\$1) (\$1.00) Conveyance (\$4.50) Total: \$52.58

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ndant, in the

Norman Brodeur

Norman Brodeur
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
WORCESTER COUNTY

2016 MAY 27 A 10:30

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #33

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Nancy Williams

You are hereby summoned and required to serve upon ATTORNEY CORSE N GEDWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Worcester County Sheriff's Office P.O. Box 1066 Worcester, MA 01613
(508) 752-1100

5/24/2016

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I hereby certify and return that after attempting personal service on 5/23/2016 at 4:00 PM I served a true and attested copy of the SUMMONS AND ORIGINAL COMPLAINT WITH EXHIBITS, AMENDED VERIFIED COMPLAINT WITH EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of NANCY WILLIAMS at 291 FLAT ROCK ROAD ATHOL, MA 01331 . Service Fee (\$20.00) Attest (\$5.00) Mileage (\$21.44) Mailing (\$1) (\$1.00) Conveyance (\$4.50) Total: \$51.94

Stephen E. Cormier

Stephen Cormier
Deputy Sheriff

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ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 MAY 27 A 10:31
CLERKS OFFICE
SUPERIOR COURT
WORCESTER COUNTY

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #34

Case Details - Massachusetts Trial Court

No document images available


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Massachusetts Trial Court
Electronic Case Access



Home Search

Log on 

No document images available.

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an equivalent company, Copyright
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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #35

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

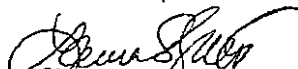
COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579CV00917

Sarah Oulton, PLAINTIFF(S)

v.

SUMMONS

Carol Haddock et al, DEFENDANT(S)
Michael Mosier-(Athena Health Care Systems)
135 South Road, Farmington, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin
plaintiff's attorney, whose address is 64 Donbray Rd. Springfield, Ma 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS

I herby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **MICHAEL MOSIER**, at the Athena Health Care Systems, 135 South Road, in the Town of Farmington.

Afterwards on the 25th day of May, 2016, I received a call from **Michael Mosier** confirming he had received the service.

FEES:

Pages	-
Endorsements	.80
Service	40.00
Travel	8.31
Total	\$ 49.11

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL
HARTFORD COUNTY

CLERKS OFFICE
SUPERIOR COURT
HARTFORD COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #36

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.
1579CV00917

Sarah Dutton, PLAINTIFF(S)

V.

SUMMONS

Carol Hladick, et al, DEFENDANT(S)

(Diane Curtis) - (Athena Health Care System)
135 South Road, Farmington, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin
plaintiff's attorney, whose address is 64 Danbury Rd. Springfield, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 17
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS


I hereby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **DIANE CURTIS**, at the Athena Health Care Systems, 135 South Road, in the Town of Farmington.

Afterwards on the 25th day of May, 2016, I received a call from **Michael Mosier** confirming he had received the service.

FEES:

Pages	-
Endorsements	.80
Service	20.00
Travel	-
Total	\$ 20.80

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL
HARTFORD COUNTY

CLERKS OFFICE
SUPERIOR COURT
HARTFORD COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #37


TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV00917

Sarah Outton, PLAINTIFF(S)

V.

SUMMONS

Carol Hadick et al, DEFENDANT(S)

Kevin Diehl - (Athena Health Care Systems)
135 South Road, Farmington, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin
plaintiff's attorney, whose address is 64 Donbray Rd. Springfield, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS


I hereby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **KEVIN DIEHL**, at the Athena Health Care Systems, 135 South Road, in the Town of Farmington.

Afterwards on the 25th day of May, 2016, I received a call from **Michael Mosier** confirming he had received the service.

FEES:

Pages	-
Endorsements	.80
Service	20.00
Travel	-
Total	\$ 20.80

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL
HARTFORD COUNTY

CLERKS OFFICE
SUPERIOR COURT
HARTFORD COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #38

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.
1579CV00917

Sarah Oulton, PLAINTIFF(S)

V.

SUMMONS


Carol Hladick, et al, DEFENDANT(S)
Lawrence Santilli - (Athena Health Care Systems)
135 South Road, Farmington, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin
plaintiff's attorney, whose address is 64 Donbray Rd. Springfield, Ma 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

PROOF OF SERVICE OF PROCESS

I herby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **LAWRENCE SANTILLI**, at the Athena Health Care Systems, 135 South Road, in the Town of Farmington.

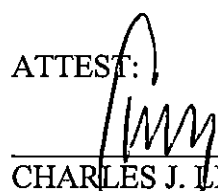
Afterwards on the 25th day of May, 2016, I received a call from **Michael Mosier** confirming he had received the service.

FEES:

Pages	-
Endorsements	.80
Service	20.00
Travel	-

Total \$ 20.80

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL
HARTFORD COUNTY

CLERKS OFFICE
SUPERIOR COURT
HARTFORD COUNTY,

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #39

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER


COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.
1579CV00917

Sarah Bolton, PLAINTIFF(S)

V.

SUMMONS

Carol Hladick, et al, DEFENDANT(S)

Valererie Chakalos-Santilli (Athena HealthCare Systems)
135 South Road, Farmington, CT

To the above named defendant:

You are hereby summoned and required to serve upon Careen Goodwin,
plaintiff's attorney, whose address is 64 Danbury Rd. Springfield, Ma 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **VALERIE CHAKALOS-SANTILLI**, at the Athena Health Care Systems, 135 South Road, in the Town of Farmington.


Afterwards on the 25th day of May, 2016, I received a call from **Michael Mosier** confirming he had received the service.

FEES:

Pages	-
Endorsements	.80
Service	20.00
Travel	-

Total \$ 20.80

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL
HARTFORD COUNTY

2016 MAY 27 A 10:26
CLERKS OFFICE
SUPERIOR COURT
HARTFORD COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #40

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

MAY 27 2016

Laura S. Gentile
CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579CV00917

Sarah Dutton, PLAINTIFF(S)

V.

SUMMONS

Carol Hladick et al, DEFENDANT(S)

Debra Sovay - (Bayview Health Care)
301 Rope Ferry Rd
Waterford, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin,
plaintiff's attorney, whose address is 64 Donbrey Rd Springfield, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.

Laura S. Gentile

Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS

I herby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **DEBRA SOVAY**, at the Office of the Administrator, James M. Pettey, Bayview Health Care, 301 Rope Ferry Road, in the Town of Waterford.

FEES:

Pages	-
Endorsements	.80
Service	40.00
Travel	53.83
Total	\$ 94.63

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL/
INDIFFERENT PERSON

CLERKS OFFICE
SUPERIOR COURT
WATERFORD COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #41

TO PLAINTIFF'S ATTORNEY; PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579CV00917

Sarah Dutton, PLAINTIFF(S)

v.

SUMMONS

Carol Hladick et al, DEFENDANT(S)

Karen Petrucelli (Bayview HealthCare)
301 Rope Ferry Rd, Waterford, CT

To the above named defendant:

You are hereby summoned and required to serve upon Coreen Goodwin
plaintiff's attorney, whose address is 64 Donbrow Rd Springfield, MA 01109,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19 day of May 2016
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.


PROOF OF SERVICE OF PROCESS

I herby certify and return that on the 25th day of May, 2016 and by the direction of the plaintiff's attorney, I served a sealed copy of the summons, together with a copy of the complaint and exhibits, in this action, upon the within named, **KAREN PETRUCELLI**, at the Office of the Administrator, James M. Pettey, Bayview Health Care, 301 Rope Ferry Road, in the Town of Waterford.

FEES:

Pages	-
Endorsements	.80
Service	20.00
Travel	-
Total	\$ 20.80

ATTEST:



CHARLES J. LILLEY
STATE MARSHAL/
INDIFFERENT PERSON

CLERKS OFFICE
SUPERIOR COURT
CAMDEN COUNTY

2016 MAY 27 A 10:26

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #42

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CW 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANICK, ET AL., DEFENDANT(S)

To the above named defendant:

James Bove

You are hereby summoned and required to serve upon ATTORNEY CORCEN GOODWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on _____, 20____, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5):

Dated: _____, 20____

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(_____)
(_____, 20____)
(_____)

177890071

PH



Suffolk County Sheriff's Department
Civil Process Division
Diligent Search



STEVEN W. TOMPKINS
SHERIFF

132 Portland Street, Boston, MA 02114
Tel. 617-704-6999 • Fax 617-704-6998

JOSEPH TERRANOVA, Esq.
CHIEF DEPUTY

File Number: 16008771 Deputy Name: FASCAID
Original Address: 2100 Dardess Ave
Dates / Times of Attempts(s): 5/24 10/5A

Unable to Serve Defendant Because:

- | | |
|--|---|
| <input type="checkbox"/> Street name does not exist / or spelled incorrect | <input type="checkbox"/> No such number of given street |
| <input type="checkbox"/> Apartment number required | <input type="checkbox"/> Defendants name is spelled incorrect |
| <input type="checkbox"/> Defendant no longer at address | <input type="checkbox"/> Defendant away until: _____ |
| <input type="checkbox"/> Time frame for service expired on: _____ | |
| <input type="checkbox"/> Other Comments: _____ | |

Terminated

I have attempted to find address by checking the following:

- | | |
|---|---|
| <input type="checkbox"/> RMV | <input type="checkbox"/> Telephone Listings |
| <input type="checkbox"/> Coles Publications | <input checked="" type="checkbox"/> Interviewed Neighbor or Relative(s) |
| <input type="checkbox"/> Internet Search: _____ | |

Security

Contacted Attorney or Pro Se: ☒ Yes ☐ No, Date / Time / Name of person spoke with: _____

Message

Alternative date(s) / time(s) called: _____

Alternative service address provided by attorney / pro se: ☐ Yes ☐ No

Alternative service address: _____

Transfer to Deputy: _____ Date of Transfer: _____

Comments: _____

Deputy Signature: [Signature] Date: 5/25/14



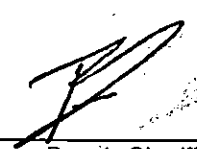
Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 24, 2016

By virtue of this writ I have made diligent search for the within-named James Bove and for his/her/its last and usual place of abode, and for his tenant, agent, or attorney, but could not find him/her/it within this county: I therefore return this writ without service. D/S In State (\$15.00) Total: \$15.00

Deputy Sheriff Robert Foscaldo


Deputy Sheriff

CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 A 10:29

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #43

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
(TORT) MOTOR VEHICLE TORT (CONTRACT) (EQUITABLE RELIEF) (OTHER)

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)


To the above named defendant:

Thomas Moylan

You are hereby summoned and required to serve upon ATTORNEY CORSEEN GOENWILL, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

50

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on _____, 20____, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5):

Dated: _____, 20____

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(_____)
(_____, 20____)
(_____)

24480001

02



Suffolk County Sheriff's Department
Civil Process Division
Diligent Search



STEVEN W. TOMPKINS
SHERIFF

132 Portland Street, Boston, MA 02114
Tel. 617-704-6999 • Fax 617-704-6998

JOSEPH TERRANOVA, Esq.
CHIEF DEPUTY

File Number: 16008772 Deputy Name: FASANO
Original Address: 171 MILK ST SUITE 32
Boston

Dates / Times of Attempts(s): 5-24 11-

Unable to Serve Defendant Because:

- | | |
|--|---|
| <input type="checkbox"/> Street name does not exist / or spelled incorrect | <input type="checkbox"/> No such number of given street |
| <input type="checkbox"/> Apartment number required | <input type="checkbox"/> Defendants name is spelled incorrect |
| <input type="checkbox"/> Defendant no longer at address | <input type="checkbox"/> Defendant away until: _____ |
| <input type="checkbox"/> Time frame for service expired on: _____ | |
| <input type="checkbox"/> Other Comments: _____ | |

NOT AVAILABLE
Office Closed No Response

I have attempted to find address by checking the following:

- | | |
|---|--|
| <input type="checkbox"/> RMV | <input type="checkbox"/> Telephone Listings |
| <input type="checkbox"/> Coles Publications | <input type="checkbox"/> Interviewed Neighbor or Relative(s) _____ |
| <input type="checkbox"/> Internet Search: _____ | |

Contacted Attorney or Pro Se: ☒ Yes ☐ No, Date / Time / Name of person spoke with: _____

Alternative date(s) / time(s) called: _____

Alternative service address provided by attorney / pro se: ☐ Yes ☐ No

Alternative service address: 50 Exchange Ter Apt
Providence, RI 02903-1745

Transfer to Deputy: _____ Date of Transfer: _____

Comments: RTA

Deputy Signature: RCF Date: 5-24-16




Suffolk County Sheriff's Department • 132 Portland Street, Boston, MA 02114 • (617) 704-6999

Suffolk, ss.

May 24, 2016

By virtue of this writ I have made diligent search for the within-named Thomas Moylan and for his/her/its last and usual place of abode, and for his tenant, agent, or attorney, but could not find him/her/it within this county; I therefore return this writ without service. D/S In State (\$15.00) Total: \$15.00

Deputy Sheriff Robert Foscaldo


Deputy Sheriff

CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 A 10:30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #44

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Laura Dossantos

You are hereby summoned and required to serve upon ATTORNEY CORSEEN GORAWIN, plaintiff's attorney, whose address is 64 NUNBURY ROAD, SPRINGFIELD MA 0119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Plymouth County Sheriff's Office
Plymouth, SS

22 Cottage Street, Brockton MA 02301 Telephone (508) 580-2110

May 27, 2016

I hereby certify and return that on 5/26/2016 at 11:35 AM I served a true and attested copy of the Summons, Verified Complaint and Demand for Jury Trial with Exhibits in this action in the following manner: To wit, by delivering in hand to Laura Dossantos at High Point Hospital 52 Oak Street Middleborough, MA . Basic Service Fee (\$30.00) Conveyance (\$4.50) Postage and Handling (\$1.00) Travel (\$23.90) Attest (1 copy) (\$5.00) Total: \$64.40

Deputy Sheriff Gregory Kamon

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 MAY 27 P 2:57
CLERKS OFFICE
SUPERIOR COURT
HAMPHDEN COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #45

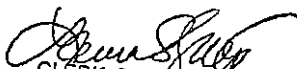
TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV. 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADEK, ET AL., DEFENDANT(S)

To the above named defendant:

Michael Walsh

You are hereby summoned and required to serve upon ATTORNEY LOREEN GERWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

May 26, 2016

Robert Murray

Date: _____, 20____

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE
ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HARPER COUNTY

2:58 PM MAY 27 1966

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #46

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.


CLERK OF COURTS

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Colonial Health Group Westridge LLC

You are hereby summoned and required to serve upon ATTORNEY CORREN GOODWIN
plaintiff's attorney, whose address is 64 MONROE ROAD, SPRINGFIELD, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 10TH day of MAY
in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.



Essex County Sheriff's Department , PO BOX 2019, Salem, MA 01970

May 26, 2016

I hereby certify and return that on 5/26/2016 at 9:18 AM I served a true and attested copy of the summons and complaint with exhibits and amended complaint with exhibits in this action in the following manner: To wit, by delivering in hand to Michael Walsh, person in charge at the time of service for Colonial Health Group Westridge, LLC, 35 Avco Road Haverhill, MA 01835. Attestation fee (\$5.00) Basic Service Fee (\$30.00) Conveyance (\$3.00) Postage and Handling (\$1.00) Travel (\$23.90) Total: \$62.90.

This is a new business, P.P.S. Michael Walsh accepted service for Colonial Health. He worked for Colonial Health Group.

Robert Murray

Deputy Sheriff Robert Murray

CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 P 2:58

42

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #47

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

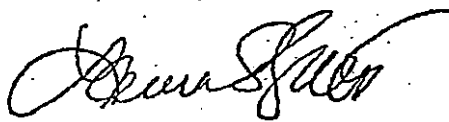
CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Christine French

You are hereby summoned and required to serve upon ATTORNEY COREEN GOODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110
Middlesex, ss.

I hereby certify and return that on 5/26/2016 at 2:55 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of CHRISTINE FRENCH, 42 ROOSEVELT Street Maynard, MA 01754 . Fees: Attest (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Travel (\$23.84) Conveyance (\$4.50) Total: \$54.34

May 27, 2016

Paul J. Culliton

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY
2016 MAY 27 P 2:58

16 012179 103

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #48

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK ET AL., DEFENDANT(S)

To the above named defendant: Paul Picoli

You are hereby summoned and required to serve upon ATTORNEY CORSEN CORSWIN, plaintiff's attorney, whose address is 67 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19th day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/26/2016 at 1:40 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of PAUL PICOLLI, 60 HARVARD ST EXTENSION APT 2 Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Travel (\$23.84) Conveyance (\$2.40) Total: \$52.24

Paul J. Culleton

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMPSHIRE COUNTY

2016 MAY 27 P 2:58

160121825

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #49

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT

DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HADICK, ET AL., DEFENDANT(S)

To the above named defendant: Freedom Homes

You are hereby summoned and required to serve upon ATTORNEY CORSEEN COOSWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19th day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/26/2016 at 2:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of FREEDOM HOMES, 60 HARVARD Street EXT Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Conveyance (\$2.40) Total: \$28.40

Paul J. Culleton
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 P 2:58

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #50

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL A. HLASIC, ET AL., DEFENDANT(S)

To the above named defendant: Joseph Everett

You are hereby summoned and required to serve upon ATTORNEY COREEN BEDSWIN,
plaintiff's attorney, whose address is 64 SONBRAY ROAD, SPRINGFIELD, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

Middlesex, ss.

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for JOSEPH EVERETT, at JOHN EVERETT FUNERAL HOME 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$23.84) Conveyance (\$2.40) Total: \$62.24

Paul J. Clinton
Deputy Sheriff

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE
ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMPDEN COUNTY

2016 MAY 27 P. 2:58

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #51

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANCK, ET AL., DEFENDANT(S)

To the above named defendant: Luke Simpson

You are hereby summoned and required to serve upon ATTORNEY COREEN GOODWIN, plaintiff's attorney, whose address is 64 NONBRAY ROAD, SPRINGFIELD, MA 0119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for LUKE SIMPSON, at EVERETT & SONS FUNERAL HOME 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$2.40) Total: \$38.40

May 27, 2016

Paul J. Culliton
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
CAMDEN COUNTY

2016 MAY 27 P 2:58

16012185
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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #52

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLASICK, ET AL., DEFENDANT(S)

To the above named defendant: Maureen Reeve

You are hereby summoned and required to serve upon ATTORNEY CORSEN CROWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for MAUREEN REEVE, at EVERETT & SONS FUNERAL HOME 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$2.40) Total: \$38.40

Paul J. Culleton
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 P 2:58

16012189

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #53

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS


CAROL B. HLASICZ, ET AL., DEFENDANT(S)

To the above named defendant: Dennis Cunningham

You are hereby summoned and required to serve upon ATTORNEY COREEN GEORGIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

61

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for DENNIS CUNNINGHAM, at EVERETT & SONS FUNERAL HOME 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Travel (\$1.00) Conveyance (\$2.40). Total: \$38.40

Paul J. Culleton

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

2016 MAY 27 PM 2:59

16012188

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #54

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: Susan Davis

You are hereby summoned and required to serve upon ATTORNEY CORSEEN GOODWIN, plaintiff's attorney, whose address is 64 MONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT -- You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

62

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS at EVERETT & SONS FUNERAL HOME 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$2.40) Total: \$38.40

Paul J. Culleton

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 P 2:59

16012187

24

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #55

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT
FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HEANICK, ET AL., DEFENDANT(S)

To the above named defendant:

John Everett & Sons Funeral Home

You are hereby summoned and required to serve upon ATTORNEY CORCEN GOODWIN, plaintiff's attorney, whose address is 64 SONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

63

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110
Middlesex, ss.

I hereby certify and return that on 5/26/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for JOHN EVERETT & SONS FUNERAL HOME, at 4 PARK Street Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$2.40) Total: \$38.40

May 27, 2016

Paul J. Culleton

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
WAMPDEN COUNTY

2016 MAY 27 P 2:59

16012186

20

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #56

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
(TORT) MOTOR VEHICLE TORT (CONTRACT) (EQUITABLE RELIEF) (OTHER)

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

Cynthia Bracciale

You are hereby summoned and required to serve upon ATTORNEY COREEN GORDWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

64

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110
Middlesex, ss.

I hereby certify and return that on 5/26/2016 at 1:50 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of CYNTHIA BRACCIALE, 54 MACARTHUR RD Natick, MA 01760 . Fees: Attest (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Travel (\$23.84) Conveyance (\$2.40) Total: \$52.24

May 27, 2016

Paul J. Dalton
Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMPSHIRE COUNTY

2016 MAY 27 P 2:59

16012174

30

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #57

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARA A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)


To the above named defendant:

Law Office of Philip Brown

You are hereby summoned and required to serve upon ATTORNEY CORAEN GOODWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY
in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

65

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/25/2016 at 12:45 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to JESSICA CORMIER, agent, person in charge at the time of service for PHILIP BROWN, at LAW OFFICE OF PHILIP BROWN 615 CONCORD Street Framingham, MA 01702 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$23.72) Conveyance (\$0.90) Total: \$60.62

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 P 2:59

16012176

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #58

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

HAMPDEN, ss

FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917


CLERK OF COURTS

SARAH A. CULLTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANICK, ET AL., DEFENDANT(S)

To the above named defendant:

Philip Brown

You are hereby summoned and required to serve upon ATTORNEY CORREEN GODWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

66

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/25/2016 at 12:40 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to SUSAN DAVIS, agent, person in charge at the time of service for PHILIP BROWN, at LAW OFFICE OF PHILIP BROWN 615 CONCORD Street Framingham, MA . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$0.90) Total: \$36.90


Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
HAMPHDEN COUNTY

2016 MAY 27 PM 2:59

16012177

303

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #59

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

MAY 27 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.


CLERK OF COURTS

1579 CV 00717

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLANICK, ET AL., DEFENDANT(S)

To the above named defendant:

Dennis Brown PC Law Office

You are hereby summoned and required to serve upon ATTORNEY COREEN GORDWIN, plaintiff's attorney, whose address is 64 MONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

67

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/25/2016 at 1:05 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to OFFICE STAFF, agent, person in charge at the time of service for DENNIS BROWN, at LAW OFFICE OF DENNIS BROWN 869 CONCORD Street Framingham, MA 01701 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$23.72) Conveyance (\$0.90) Total: \$60.62

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
TAMM DEN COUNTY

2016 MAY 27 P 2:59

16012180
12

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #60

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT MOTOR VEHICLE TORT CONTRACT EQUITABLE RELIEF OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

MAY 27 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 80917

SARAH A. OULTON, PLAINTIFF(S)

V.

SUMMONS

CAROL B. HANICK, ET AL., DEFENDANT(S)


To the above named defendant:

Dennis Brown

You are hereby summoned and required to serve upon ATTORNEY CORREN GOODWIN, plaintiff's attorney, whose address is 64 DONRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 19TH day of MAY in the year of our Lord two thousand sixteen.


Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

68

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 827, Framingham, MA 01701 • (508) 872-3110

Middlesex, ss.

May 27, 2016

I hereby certify and return that on 5/25/2016 at 1:00 PM I served a true and attested copy of the SUMMONS, COMPLAINT & EXHIBITS, AMENDED COMPLAINT & EXHIBITS in this action in the following manner: To wit, by delivering in hand to OFFICE STAFF, agent, person in charge at the time of service for DENNIS BROWN, at LAW OFFICE DENNIS BROWN 869 CONCORD Street Framingham, MA 01701 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Conveyance (\$0.90) Total: \$36.90

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

2016 MAY 27 P 2:59

16012181

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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #61

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.
Plaintiffs,

v.

Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUN 27 2016


CLERK OF COURTS

**PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO EXTEND DEADLINE FOR
SERVICE OF PROCESS ON ARTHUR BERGERON
AND ALLOW SERVICE BY PUBLICATION**

Now comes the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), and respectfully move this court pursuant to Mass.R.Civ.P. 6(b)(2) to enlarge the time for service of the Summons and Complaint on Defendant Arthur Bergeron by an additional forty-five (45) days and to allow for service of process to be effected by publication. In support of Motion Plaintiffs state the following:

1. On May 23, 2016, Worcester County Deputy Sheriff Derry ("Deputy Derry") attempted to serve Defendant Arthur Bergeron ("Attorney Bergeron") at the Westborough Massachusetts office of Mirick, O'Connell, DeMallie & Lougee, LLP ("Mirick O'Connell"), located at 800 West Park Drive, Suite 400, Westborough, Massachusetts, because Attorney Bergeron is currently listed as "Of Counsel" at that address.

2. Attorney Bergeron was not present at his office upon Deputy Derry's arrival so and Attorney Bergeron's legal assistant telephoned Attorney Bergeron to inform Attorney

Bergeron that Deputy Derry was on site to serve the Summons and Complaint on Attorney Bergeron. Attorney Bergeron's legal assistant reported to Deputy Derry that Attorney Bergeron stated that she did not have authority to accept service of the Summons and Complaint for Arthur Bergeron.

4. Plaintiffs then attempted to serve Attorney Bergeron through his counsel of record, Mirick O'Connell Attorney John Mirick ("Attorney Mirick"), at Mirick O'Connell's Worcester, Massachusetts office located at 100 Front Street Worcester, Massachusetts.

5. Although Attorney Mirick has entered a notice of appearance on behalf of Defendant Arthur Bergeron in this matter, and although Attorney Mirick has accepted service of process on behalf of all other Mirick O'Connell defendants (i.e., Attorney Mirick, Attorney Jason Port, and the law firm of Mirick O'Connell), Attorney Mirick refused to accept service of process on behalf of his co-defendant and client, Attorney Bergeron.

5. The Worcester County Sheriff's Office has provided a statement indicating that service of process was refused at both the Westborough and Worcester, Massachusetts offices of Mirick O'Connell.

6. Following Attorney Bergeron's and Attorney Mirick's refusal to accept service of process at both the Westborough and Worcester offices of Mirick O'Connell, Plaintiffs engaged the Worcester County and Middlesex County Sheriff's offices to effect service of process on Attorney Bergeron at his home. Both Sheriff's offices were unable to effect service of process on Attorney Bergeron at his home because neither office could locate Attorney Bergeron's home address.

WHEREFORE, Plaintiffs respectfully move this court pursuant to Mass.R.Civ.P. 6(b)(2) to enlarge the time for service of the Summons and Complaint on Defendant Arthur Bergeron by an

additional forty-five (45) days and to allow for service of process to be effected by publication.

Dated: June 27, 2016.

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON, SARAH A.
OULTON ON BEHALF OF THE ESTATE OF
DONALD PAUL OULTON, and SARAH A.
OULTON ON BEHALF OF THE ESTATE OF
CAROL JANE OULTON
BY AND THROUGH THEIR ATTORNEY



Coreen Goodwin
BBO No. 693188
64 Donbray Road
Springfield, MA 01119
Telephone: 413- 241-1004
Email: AttorneyGoodwin@yahoo.com

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #62

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.
Plaintiffs,

v.

Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUN 27 2016


CLERK OF COURTS

**PLAINTIFFS' *EX PARTE* MOTION TO ENLARGE TIME FOR SERVICE OF
PROCESS BY PUBLICATION**

Now comes the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), and respectfully move this court pursuant to Mass.R.Civ.P. 6(b)(2) to enlarge the time for service of the Summons and Complaint by an additional 45 days for service of process by publication on the following five defendants: (1) James Bove, (2) Vinay Kumar, (3) John Kain, (4) Richard Kravetz, and (5) Denise Stephenson. In support of Motion Plaintiffs state the following:

1. Prior to the May 27, 2016, deadline for service of process, Plaintiffs hired Sheriff's deputies to attempt to serve the above-named defendants, however those deputies were unable to locate the defendants for service of process.

2. On May 27, 2016, Plaintiffs filed a motion to extend the deadline for service of process on the above-named defendants. This court granted Plaintiffs' motion.

3. On June 9, 2016, notice of the allowance of the motion to extend the deadline for service of process was mailed to Plaintiffs' attorney, Attorney Coreen Goodwin.

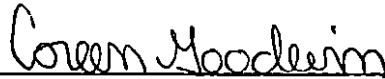
4. Because publication requires first obtaining the Orders of Publication from this court and then publishing the Orders for three consecutive weeks, Plaintiffs will be unable to meet the deadline for service of process on the above-named defendants unless the deadline for such service of process is extended by 45 days.

WHEREFORE, Plaintiffs move that the court enlarge the period for service of process for an additional 45 days for service of process on (1) James Bove, (2) Vinay Kumar, (3) John Kain, (4) Richard Kravetz, and (5) Denise Stephenson.

Dated: June 27, 2016

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON, SARAH A.
OULTON ON BEHALF OF THE ESTATE OF
DONALD PAUL OULTON, and SARAH A.
OULTON ON BEHALF OF THE ESTATE OF
CAROL JANE OULTON
BY AND THROUGH THEIR ATTORNEY



Coreen Goodwin
BBO No. 693188
64 Donbray Road
Springfield, MA 01119
Telephone: 413- 241-1004
Email: AttorneyGoodwin@yahoo.com

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #63

TO PLAINTIFF ATTORNEY: PLEASE CIRCLE TYPE ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQU...BLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT

FILED

JUL - 1 2016


CLERK OF COURTS

SUPERIOR COURT

DEPARTMENT OF THE TRIAL COURT

CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, ET AL., PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLAUCK, ET AL., DEFENDANT(S)

To the above named defendant:

GINA M. QUEIROZ

You are hereby summoned and required to serve upon ATTORNEY COREEN GEDSWIN
plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD MA 01109
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 15TH day of JUNE
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

YTHUOD WEIGNMAH
PROOF OF SERVICE OF PROCESS

I hereby certify and return that on _____, 20____, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5)).

Dated: _____, 20____

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(_____)
(_____ , 20____)
(_____)

Rockingham County Sheriff's Office
CERTIFICATE OF SERVICE

MASS
County of Rockingham, New Hampshire

OUNTON, SARAH A

Docket Number: 1579CV00917

vs.

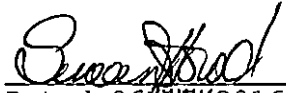
Sheriff File Number: 16-4523-CP

QUEIROS, G

I, DEPUTY SHERIFF RICHARD C 010-WILTSHIRE, of the Rockingham County Sheriff's Office, Rockingham County, New Hampshire, certify and affirm that on 06/17/2016 at approximately 11:25am at 442 MAIN ST, FREMONT, NH served the within OOS SUMMONS / COMPLAINT / AMENDED COMPLAINT & EXHIBITS upon GINA M QUEIROS, the defendant named herein, in the following manner.

ABODE SERVICE

By leaving at the last and usual place of abode of the defendant


Dated: 06/17/2016




DEPUTY SHERIFF RICHARD C 010-WILTSHIRE

2016 JUL -1 P 1:48

CLERKS OFFICE
SUPERIOR COURT
CLATSOP COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #64

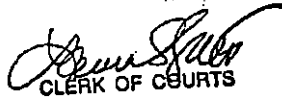
TO PLAINTIFF'S TORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL - 1-2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. OULTON, ET AL., PLAINTIFF(S)

V.

SUMMONS

CAROL B. HADICK, ET AL., DEFENDANT(S)

To the above named defendant:

MELISSA L. CURLEY

You are hereby summoned and required to serve upon ATTORNEY CORSEN GOODWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 15TH day of JUNE
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

5394

6-15-16

82

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on 6/17, 2016, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5))

To Attorney Melissa Cukley

Of #26
Baron Schutze
Deputy Sheriff (R.I.)
670 New London Ave
CRANSTON, R.I. 02920

Dated: 6/17, 2016

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

(
(, 20)
()



Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Division of Sheriffs

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914



Chief David M. DeCesare
Sheriff
Rhode Island Division of Sheriffs

CIVIL PROCESS INFORMATION SHEET

PLEASE PRINT CLEARLY

ALL INFORMATION PROVIDED REMAINS CONFIDENTIAL

YOU MUST BRING THIS PROOF OF SERVICE
TO THE COURT UPON RECEIPT

PLAINTIFF: SARAH A. OULTON DATE OF BIRTH: 02-25-1963

ADDRESS: P.O. BOX 888 FLOOR & APT. #

CITY: AGAWAM, MA ZIP: 01001

HOME # CELL # 413-686-7777 WORK:

PERSON BEING SERVED FLOOR AND APT # NEEDED

DEFENDANT: ATTORNEY MELISSA CUPLEY Serve DATE OF BIRTH:

ADDRESS: BOGUE MOYLAN & MARINO LLP FLOOR & APT. # FIFTH

55 PINE STREET, 5TH FLOOR
CITY: PROVIDENCE, RI ZIP: 02903

HOME # CELL # WORK # 401-453-0550

PLACE OF EMPLOYMENT: (PERSON BEING SERVED)

COMPANY NAME: BOGUE MOYLAN & MARINO LLP

ADDRESS: 55 PINE STREET CITY: PROVIDENCE ZIP: 02903
5TH FLOOR

DAYS WORKED: M-F HOURS WORKED: 9⁰⁰ - 5⁰⁰

DESCRIPTION:

HEIGHT: WEIGHT: AGE: ~35 HAIR: BROWN RACE: WHITE

VEHICLE MAKE: MODEL: COLOR:

PLATE #: BEARD: yes no MUSTACHE: yes no GLASSES: yes no

ANY ADDITIONAL COMMENTS OR REMARKS:

2015 JUL -1 P 1:49

CLERKS OFFICE
SUPERIOR COURT
CAMDEN COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #65

IDK

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL - 1 2016


CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

SARAH A. CULTON, ET AL., PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant: THOMAS J. MOYLAN

You are hereby summoned and required to serve upon ATTORNEY CORSEEN GROWIN, plaintiff's attorney, whose address is 64 DONBRAY ROAD, SPRINGFIELD, MA 01119, an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You are also required to file your answer to the complaint in the office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 15TH day of JUNE
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

Sch 45-

83 6-15-16 5382

YERUCCO MEGUMAH
PROOF OF SERVICE OF PROCESS

I hereby certify and return that on 6/17, 2016, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5))

To Attorney Thomas Moylan

Of #26
Brian Schultz
Deputy Sheriff (R.I.)
670 New London Ave
CRANSTON, R.I. 02921

Dated: 6/17, 2016

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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(, 20)
()



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Division of Sheriffs

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914



Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Chief David M. DeCesare
Sheriff
Rhode Island Division of Sheriffs

CIVIL PROCESS-INFORMATION SHEET

PLEASE PRINT CLEARLY

ALL INFORMATION PROVIDED REMAINS CONFIDENTIAL

YOU MUST BRING THIS PROOF OF SERVICE
TO THE COURT UPON RECEIPT

PLAINTIFF: SARAH A. OULTON DATE OF BIRTH: 02-25-1963

ADDRESS: P.O. BOX 888 FLOOR & APT. #

CITY: AGAWAM, MA ZIP: 01001

HOME # CELL # 413-686-7777 WORK:

PERSON BEING SERVED FLOOR AND APT # NEEDED

DEFENDANT: ATTORNEY THOMAS MOYLAN Seve
DATE OF BIRTH:

ADDRESS: FLOOR & APT. #

CITY: ZIP:

HOME # CELL # WORK # 401-453-0550

PLACE OF EMPLOYMENT: (PERSON BEING SERVED)

COMPANY NAME: BOGUE MOYLAN & MARINO, LLP

ADDRESS: 55 PINE STREET CITY: PROVIDENCE ZIP: 02903
FIFTH FLOOR

DAYS WORKED: M-F HOURS WORKED: 9:00 - 5:00

DESCRIPTION:

HEIGHT: WEIGHT: AGE: HAIR: RACE: WHITE

VEHICLE MAKE: MODEL: COLOR:

PLATE #: BEARD: yes no MUSTACHE: yes no GLASSES: yes no

ANY ADDITIONAL COMMENTS OR REMARKS:

2016 JUL -1 P 1:49

CLERKS OFFICE
SUPERIOR COURT
CLATSOP COUNTY

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #66

TO PLAINTIFF ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUIPMENT - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN COUNTY
SUPERIOR COURT

FILED

HAMPDEN, ss

JUL - 1 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO.

1579 CV 00917

Laura S. Gentile
CLERK OF COURTS

SARAH A. OULTON, ET AL., PLAINTIFF(S)

V.

SUMMONS

CAROL B. HLADICK, ET AL., DEFENDANT(S)

To the above named defendant:

PLAURNE BOGUE MOYLAN & MARINO, LLP
% ATTORNEY THOMAS MOYLAN

You are hereby summoned and required to serve upon ATTORNEY CORSEN GOODWIN
plaintiff's attorney, whose address is 64 MONRAY ROAD SPRINGFIELD, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 15TH day of JUNE, 2016
in the year of our Lord two thousand sixteen!

Laura S. Gentile

Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

FORM No. 1

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

5395
15-16



Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY

Division of Sheriffs

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914



Chief David M. DeCesare
Sheriff
Rhode Island Division of Sheriffs

Served

CIVIL PROCESS-INFORMATION SHEET

PLEASE PRINT CLEARLY

ALL INFORMATION PROVIDED REMAINS CONFIDENTIAL

YOU MUST BRING THIS PROOF OF SERVICE
TO THE COURT UPON RECEIPT

*Hold will p/ up
proofs
need by end of
6/20/16
940AM
Hm/m*

PLAINTIFF: SARAH A. DULTON DATE OF BIRTH: 02-25-1963 June

ADDRESS: P.O. BOX 888 FLOOR & APT. #

CITY: AGAWAM MA ZIP: 01001

HOME # CELL # 413-686-7777 WORK:

PERSON BEING SERVED FLOOR AND APT # NEEDED

(LAW FIRM) PLOURDE BOGUE MOYLAN & MARINO LLP

DEFENDANT: C/O THOMAS MOYLAN DATE OF BIRTH:

ADDRESS: FLOOR & APT. #

CITY: ZIP:

HOME # CELL # WORK #

PLACE OF EMPLOYMENT: (PERSON BEING SERVED *served here*)

COMPANY NAME: BOGUE MOYLAN & MARINO LLP *c/o Thomas Moylan*

ADDRESS: 55 PINE STREET CITY: PROVIDENCE ZIP: 02903

DAYS WORKED: 5TH FLOOR HOURS WORKED: 900 - 500
M-F

DESCRIPTION:

HEIGHT: WEIGHT: AGE: HAIR: RACE:

VEHICLE MAKE: MODEL: COLOR:

PLATE #: BEARD: yes no MUSTACHE: yes no GLASSES: yes no

ANY ADDITIONAL COMMENTS OR REMARKS:

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #67

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants

ORDER OF NOTICE BY PUBLICATION

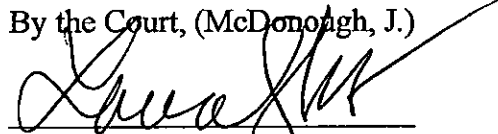
This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, James Bove, whose last known address was 2100 Dorchester Ave. Dorchester, MA 02122 by publishing an attested copy of this order once each week for three consecutive weeks in the Dorchester Reporter, a newspaper published in the City of Dorchester, at least twenty days before the 1st of September, 2016, and that said Defendant, James Bove do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you James Bove fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton, which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 11th day of July, 2016

By the Court, (McDonough, J.)



Laura S. Gentile, Esquire
Clerk of Courts

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #68

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants

ORDER OF NOTICE BY PUBLICATION

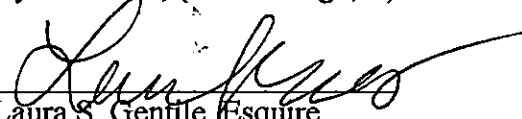
This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Denise Stephenson whose last known address was 14 Harriman Road Hudson, MA 01749 by publishing an attested copy of this order once each week for three consecutive weeks in the Hudson Sun, a newspaper published in the City of Hudson at least twenty days before the 1st of September, 2016, and that said Defendant, Denise Stephenson do cause her written appearance to be entered and her written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Denise Stephenson fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton, which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 11th day of July, 2016

By the Court, (McDonough, J.)


Laura S. Gentile, Esquire
Clerk of Courts

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #69

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants.

ORDER OF NOTICE BY PUBLICATION


This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendants, Richard Kravetz and John Kain whose last known business address was 35 Avco Rd. Haverhill, MA 01835 by publishing an attested copy of this order once each week for three consecutive weeks in the Haverhill Gazette, a newspaper published in the City of Haverhill, at least twenty days before the 1st of September, 2016, and that said Defendants, Richard Kravetz and John Kain do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Richard Kravetz and John Kain fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton, which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 11th day of July, 2016

By the Court, (McDonough, J.)



Laura S. Gentile, Esquire
Clerk of Courts

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #70

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants

ORDER OF NOTICE BY PUBLICATION

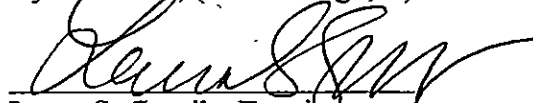
This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Vinay Kumar, M.D., whose last known business address was 246 Maple St. Marlborough, MA, 01752 by publishing an attested copy of this order once each week for three consecutive weeks in the Marlborough Enterprise, a newspaper published in the City of Marlborough, at least twenty days before the 1st of September, 2016, and that said Defendant, Vinay Kumar, M.D. do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Vinay Kumar, M.D. fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton, which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 11th day of July, 2016

By the Court (McDonough, J.)



Laura S. Gentile, Esquire
Clerk of Courts

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #71

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss..

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants

ORDER OF NOTICE BY PUBLICATION

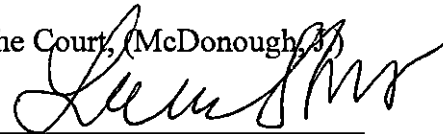
This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Attorney Arthur P. Bergeron, whose last known business address was 1800 West Park Drive, Suite 400, Westborough, MA 01581 by publishing an attested copy of this order once each week for three consecutive weeks in the Worcester Telegram, a newspaper published in the City of Worcester at least twenty days before the 1st of September, 2016, and that said Defendant, Attorney Arthur P. Bergeron, do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Attorney Arthur P. Bergeron, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 12th day of July, 2016

By the Court, (McDonough, J.)



Laura S. Gentile, Esquire
Clerk of Courts

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #72

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

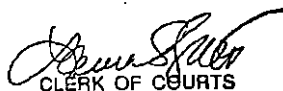
HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.
Plaintiffs,
v.
Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL 26 2016


CLERK OF COURTS

**PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO ENLARGE TIME FOR
RE-SERVICE OF PROCESS ON FOUR OUT-OF-STATE DEFENDANTS**

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), and respectfully move this court pursuant to Mass.R.Civ.P. 6(b)(2) to enlarge the time for service of the Summons and Complaint by an additional seven (7) days so that Plaintiffs may procure a "replacement" set of completed Returns of Service from the Rhode Island Division of Sheriffs after its deputies re-served process on the following four defendants: (1) Keough + Sweeney, Ltd., (2) Attorney Jerome V. Sweeney III, (3) Attorney Sean P. Keough, and (4) Attorney Joseph A. Keough, Jr. In support of this Motion Plaintiffs state the following:

1. On June 17, 2016, the court granted Plaintiffs' **PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO ENLARGE TIME FOR RE-SERVICE OF PROCESS ON EIGHT DEFENDANTS**, which extended the deadline for service of process on the four above-named defendants to July 27, 2016.

2. Plaintiffs subsequently transmitted four Summonses, four copies of the Verified

ALLOWED.

Jones, J.

7/27/16 ✓ SAR

7/27/16

90

Complaint and Demand for Jury Trial (the “Complaint”), and four copies of the Amended Verified Complaint and Demand for Jury Trial (the “Amended Complaint”) to the Rhode Island Division of Sheriffs for service of process on the four above-named defendants.

3. In mid-July, a clerk at the Rhode Island Division of Sheriffs informed Plaintiffs’ counsel, Attorney Goodwin, that service of process had been effected by delivery of the Summonses, Complaints, and Amended Complaints to the four above-named defendants at their office located at 41 Mendon Avenue, Pawtucket, RI 02861.

4. On July 25, 2016, Rhode Island Division of Sheriffs Clerk Ann Molloy (“Clerk Molloy”) informed Attorney Goodwin’s office that service of process on the four above-named defendants was made on July 18, 2016, and that the completed Returns of Service had been mailed to Attorney Goodwin’s office. As of July 25, 2016, however, Attorney Goodwin had not yet received those documents.

5. Also on July 25, 2016, Clerk Molloy sent to Attorney Goodwin, via facsimile, Affidavits confirming that process service was effected on the four above-named defendants at their office, located at 41 Mendon Avenue, Pawtucket, RI 02861, on July 18, 2016 (“**Exhibit 1**”).

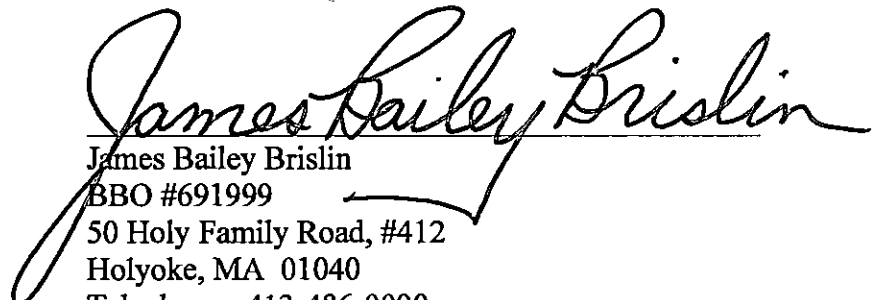
6. As of July 26, 2016, the original Returns of Service completed by the Rhode Island Division of Sheriffs have still not been received by Attorney Goodwin and are presumed to be “missing” in the U.S. Mail, thus an additional seven (7) days are required to arrange for the Rhode Island Division of Sheriffs to complete new documentation that can then be filed with this court.

WHEREFORE, Plaintiffs move that the court enlarge the period for service of process on (1) Keough + Sweeney, Ltd., (2) Attorney Jerome V. Sweeney III, (3) Attorney Sean P. Keough, and (4) Attorney Joseph A. Keough, Jr. by an additional seven (7) days so that Plaintiffs may arrange for the Rhode Island Division of Sheriffs to complete new Returns of Service to replace the Returns of Service that were completed by the Rhode Island Division of Sheriffs in mid-July but which have subsequently been lost in the mail.

Dated: July 26, 2016

Respectfully submitted,

PLAINTIFF SARAH A. OULTON
BY AND THROUGH HER ATTORNEY


James Bailey Brislin
BBO #691999
50 Holy Family Road, #412
Holyoke, MA 01040
Telephone: 413-486-0090
Email: AttyBrislin@Gmail.com

**COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT**

HAMPDEN, ss.

DOCKET NO. 1579CV00917

**Sarah A. Oulton, et al.,
Plaintiffs,**

v.

**Carol B. Hladick, et al,
Defendants.**

**AFFIDAVIT IN SUPPORT OF
PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO ENLARGE TIME FOR
RE-SERVICE OF PROCESS ON FOUR OUT-OF-STATE DEFENDANTS**

I, SARAH A. OULTON, being duly sworn according to law and having personal knowledge of all facts stated herein, do hereby depose and say:

1. I am the Plaintiff in the above-captioned case.
2. My mailing address is P.O. Box 888, Agawam, MA 01001.
3. The facts stated in the above **PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO ENLARGE TIME FOR RE-SERVICE OF PROCESS ON FOUR OUT-OF-STATE DEFENDANTS** are true and correct.
4. My attorneys require additional time re-serve process personally on the Eight Defendants named above.

Signed under the pains and penalties of perjury this 26th day of July, 2016.



Sarah A. Oulton

EXHIBIT 1

**RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY****Division of Sheriffs**

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914

Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Plaintiff:

Sarah Aukon

Defendant:

Keough & Sweeney**AFFIDAVIT**

I, Ann Molloy, first being duly sworn make
affidavit and say:

That on the 15 day of July 2016 AD, this office received process for
service in the above matter and the same was turned over to Deputy Sheriff

Nardella, to be served on the defendant at

41 Weston Ave Pawtucket

Deputy Sheriff Nardella made service of process upon

Keough & Sweeney, at the above address on

7-18-16. This service was

made L+U signed by Pat Campbell

ANN MOLLOY
R. I. STATE SHERIFF
HEADQUARTERS

6299

**RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY****Division of Sheriffs**

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914

Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Plaintiff:

Sarah O'hon

Defendant:

Jerome Sweney**AFFIDAVIT**

I, Ann Molloy, first being duly sworn make
affidavit and say:

That on the 15 day of July 2016 AD, this office received process for
service in the above matter and the same was turned over to Deputy Sheriff

Nardo Lillo, to be served on the defendant at

41 Mendon Ave Pawtucket RI

Deputy Sheriff Nardo Lillo made service of process upon

Jerome Sweney, at the above address on

7-18-16. This service was

made L & U and signed by
Pat Campbell

ANN MOLLOY
R. I. STATE SHERIFF
HEADQUARTERS

6298



RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY
Division of Sheriffs

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914

Colonel Steven G. O'Donnell
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Plaintiff:

Defendant:

Sarah Ouhon
Joseph Keough, JR

AFFIDAVIT

I, *Ann Molloy*, first being duly sworn make
affidavit and say:

That on the *15* day of *July* 20*16* AD, this office received process for
service in the above matter and the same was turned over to Deputy Sheriff

Naido Lillo, to be served on the defendant at

41 Mendon Ave Pawt. RI

Deputy Sheriff *Naido Lillo* made service of process upon

Joseph Keough, JR at the above address on
7-18-16

This service was

made Ltr signed by
Pat Campbell

ANN MOLLOY
R. I. STATE SHERIFF
HEADQUARTERS

6300

**RHODE ISLAND DEPARTMENT OF PUBLIC SAFETY****Division of Sheriffs**

670 New London Avenue, Cranston, RI 02920
Telephone: (401) 275-2900 — Fax: (401) 275-2914

Colonel Steven G. O'Daniel
Commissioner, Department of Public Safety
Superintendent, Rhode Island State Police

Plaintiff:

Sarah Ochoa

Defendant:

Sean Keough**AFFIDAVIT**

I, Ann Molloy, first being duly sworn make
affidavit and say:

That on the 15 day of July 2016 AD, this office received process for
service in the above matter and the same was turned over to Deputy Sheriff

Nardo Lillo to be served on the defendant at

44 Mendon Ave Pawt. CT

Deputy Sheriff Nardo Lillo made service of process upon

Sean Keough at the above address on

7-18-16. This service was

made Lt & signed by

Pat Campbell

ANN MOLLOY
R. I. STATE SHERIFF
HEADQUARTERS

6301

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #73

TO PLAINTIFF'S ATTORNEY: PLEASE CIRCLE TYPE C ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL 26 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO. 15-917


CLERK OF COURTS

SARAH A. OULTON + on behalf, PLAINTIFF(S)
of estates of Carol + Donald Oulton

v.

SUMMONS


Carol Hadick et al, DEFENDANT(S)

To the above named defendant: WINSTON LAW GROUP, LLC

You are hereby summoned and required to serve upon SARAH A. OULTON
plaintiff's attorney, whose address is 64 Danbury Rd Springfield MA 01109,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 14 day of July 2016
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171

Middlesex, ss.

July 22, 2016

I hereby certify and return that on 7/22/2016 at 1:32 PM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT, AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to ANGELICA RICCARDI, agent, person in charge at the time of service for WINSTON LAW GROUP, at 440 BROADWAY Somerville, MA 02145. Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$24.68) Total: \$60.68

Dave Rodrigues

Deputy Sheriff

N.B. TO PROCESS SERVER:

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT IN THIS BOX ON THE ORIGINAL AND ON COPY SERVED ON DEFENDANT.

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2016 JUL 26 P 3:27

CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

16010595

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #74

TO PLAINTIFF ATTORNEY: PLEASE CIRCLE TYPE ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL 26 2016

[Signature]
CLERK OF COURTS

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO. 15-917

SARAH A. OULTON and on behalf, PLAINTIFF(S)
of estates of Carol + Donald Oulton
V.

SUMMONS

Carol Hladick et al, DEFENDANT(S)

To the above named defendant:

MICHAEL COUTURE

You are hereby summoned and required to serve upon Sarah A. Oulton
plaintiff's attorney, whose address is 64 Donbray Rd Springfield, MA 01119
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 14 day of July 2016
in the year of our Lord two thousand sixteen

[Signature]

Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on _____, 20____, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5):



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171

Middlesex, ss.

I hereby certify and return that on 7/22/2016 at 1:32 PM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT, AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to ANGELICA RICCARDI, agent, person in charge at the time of service for MICHAEL COUTURE, at 440 BROADWAY WINSTON LAW GROUP Somerville, MA 02145. Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$24.68) Total: \$60.68

July 22, 2016

Dave Rodrigues

Deputy Sheriff

2016 JUL 26 P 13:27

CLERKS OFFICE
SUPERIOR COURT
HAMDEN COUNTY

765010071

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #75

TO PLAINTIFF ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

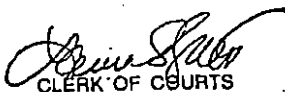
COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL 26 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO. 15-917


CLERK OF COURTS

SARAH OULTON & SARAH A. OULTON, PLAINTIFF(S)
on behalf of estate of Carol Oulton
and behalf of estate of Donald Oulton

SUMMONS

Carol Hladick et al, DEFENDANT(S)

To the above named defendant: NEAL WINSTON

You are hereby summoned and required to serve upon Sarah A. Oulton
plaintiff's attorney, whose address is 164 Donbrau Rd Springfield MA 01109
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 14 day of July 2016
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

Middlesex, ss.

I hereby certify and return that on 7/22/2016 at 1:32 PM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT, AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by delivering in hand to ANGELICA RICCARDI , agent, person in charge at the time of service for NEAL WINSTON, at 440 BROADWAY WINSTON LAW GROUP Somerville, MA 02145 . Fees: Attest (\$5.00) Basic Service Fee (\$30.00) Postage and Handling (\$1.00) Travel (\$24.68) Conveyance (\$0.60) Total: \$61.28

Dave Rodrigues

Deputy Sheriff

PLEASE PLACE DATE YOU MAKE SERVICE ON DEFENDANT: IN THIS BOX ON THE
ORIGINAL AND ON COPY SERVED ON DEFENDANT.

2016 JUL 26 P 3:27

CLERKS OFFICE
SUPERIOR COURT
LAPEER COUNTY

110010593

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #76

TO PLAINTIFF ATTORNEY: PLEASE CIRCLE TYPE OF ACTION INVOLVED:
TORT - MOTOR VEHICLE TORT - CONTRACT - EQUITABLE RELIEF - OTHER

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, ss

HAMPDEN COUNTY
SUPERIOR COURT
FILED

JUL 26 2016

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT
CIVIL ACTION NO. 15-917


CLERK OF COURTS

SARAH A. OULTON, PLAINTIFF(S)
+ behalf of estates of Carol Oulton
v. + estate of Donald Oulton

SUMMONS

Carol Madlick et al, DEFENDANT(S)

To the above named defendant: JEROME V. SWEENEY II

You are hereby summoned and required to serve upon SARAH A. OULTON,
plaintiff's attorney, whose address is 64 Donbroy Rd Springfield, MA 01119,
an answer to the complaint which is herewith served upon you, within 20 days after service of this summons
upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you
for the relief demanded in the complaint. You are also required to file your answer to the complaint in the
office of the Clerk of this court at Springfield either before service upon the plaintiff's attorney or within a
reasonable time thereafter.

Unless otherwise provided by rule 13(a), your answer must state as a counterclaim any claim which you
may have against the plaintiff which arises out of the transaction or occurrence that is the subject matter of the
plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Witness, Judith Fabricant, Esq., at Springfield the 14 day of July 2016
in the year of our Lord two thousand sixteen!



Laura S. Gentile, Esquire
CLERK OF COURTS

NOTES:

1. This summons is issued pursuant to Rule 4 of the Massachusetts Rules of Civil Procedure
2. When more than one defendant is involved, the names of all such defendants should appear in the caption. If a separate summons is used for each defendant, each should be addressed to the particular defendant.

NOTICE TO DEFENDANT - You need not appear personally in court to answer the complaint, but if you claim to have a defense, either you or your attorney must serve a copy of your written answer within 20 days as specified herein and also file the original in the Clerk's office.

PROOF OF SERVICE OF PROCESS

I hereby certify and return that on July 21, 2016, I served a copy of the within summons, together with a copy of the complaint, in this action, upon the within named defendant, in the following manner (See Mass. R. Civ. P. 4 (d)(1-5):



Middlesex Sheriff's Office • Civil Division, P.O. Box 410180, Cambridge, MA 02141-0002 • (617) 547-1171

Middlesex, ss.

July 22, 2016

I hereby certify and return that on 7/21/2016 at 2:30 PM I served a true and attested copy of the SUMMONS AND VERIFIED COMPLAINT, AMENDED VERIFIED COMPLAINT AND EXHIBITS in this action in the following manner: To wit, by leaving at the last and usual place of abode of JEROME SWEENEY, II, 21 SALEM STREET Wakefield, MA 01880 . Fees: Attest (\$5.00) Basic Service Fee (\$20.00) Postage and Handling (\$1.00) Travel (\$25.28) Conveyance (\$3.30) Total: \$54.58

Stephen F. Dickey

Deputy Sheriff

2016 JUL 26 P 3:26

CLERKS OFFICE
SUPERIOR COURT
MIDDLESEX COUNTY

160165946

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #77

A

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION NO. 1579CV00917

SARAH A. OULTON,
Plaintiff

V.

CAROL B. HLADICK, et al.,
Defendants

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG - 1 2016


CLERK OF COURTS

MOTION TO TRANSFER CASE TO MIDDLESEX COUNTY

Defendants Colonial Health Group-Westridge, LLC ("Colonial"), Michael Walsh, William Mantzoukas, Richard Kravetz, John Kain, Michael B. Lincoln, Gina M. Queiros, Andrea B. Edwards, Donna DelCid, Karen M. Speroni, Christine A. French, Denise Stephenson, Sauda Matovu, Vinay Kumar, M.D., Athena Health Care Systems MA III LLC ("Athena"), James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Michael Mosier, Karen Petrucelli, Laura DosSantos, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski (together, "the Nursing Home Defendants") and John Everett & Sons Funeral Home, Joseph T. Everett, Dennis Cunningham, Susan Davis, Maureen Reeve, Brian Falvey, Luke Simpson, and Richard Kelly (together, "the Funeral Home Defendants") move that this case be transferred to Middlesex County which is a more convenient forum for the Defendants. All Defendants who

have appeared by counsel assent to this Motion.¹ See Exhibit 1, Assents to Transfer of Counsel who have Appeared.

The plaintiff previously filed her own motion to transfer this case to Middlesex County. See Exhibit 2, Plaintiff's Emergency *Ex Parte* Motion to Remove Action Due to Improper Venue, and Affidavit of Plaintiff Sarah A. Oulton in Support of Her Motion to Transfer Due to Improper Venue, dated March 17, 2016. This motion was denied by the Court without prejudice until service had been made. See Exhibit 3, Docket, at Page 1 of 8.

This is an action brought by Sarah Oulton against her siblings and brother-in-law and sixty-two other defendants. The Plaintiff asserts twenty-seven counts arising out of the treatment of her parents until their deaths in December 2012, the sale of her parents' home in November 2012, the funeral services and burial of her parents in December 2012, and the administration of her parents' estates. Suit was originally filed in December 2015. The time for service was several times extended by ex parte motions filed by the Plaintiff. The Plaintiff has now served most of the Defendants, although service does not appear to be complete on several Defendants who reside out of the Commonwealth.

The Oulton parents lived in Middlesex County. At the times of their deaths, they were residents in a nursing home in Middlesex County. The funeral services and burial were in Middlesex County. The alleged acts about which the Plaintiff complains occurred primarily in

¹In filing this motion, the moving parties and all parties who have assented to the motion in no way waive, and explicitly reserve, any and all defenses that they may have that can be asserted under the Massachusetts Rules of Civil Procedure, including but not limited to improper service, applicable statutes of limitation, prior pending actions, collateral estoppel, and failure to state a claim. The sole intent of this motion is to transfer the case to Middlesex County, which is a more convenient forum for the resolution of the claims asserted by the plaintiff and the defenses to those claims.

Middlesex County. The only party found in Hampden County is the Plaintiff, who assents to the transfer to Middlesex County.

The Nursing Home Defendants consist of the former and present owners of the nursing home: Colonial and Athena, respectively. The facility is located in Middlesex County. The nursing home defendants also consist of thirteen current or former Colonial employees who appear to have participated in the provision of services for the Oulton parents while they were residents there, and ten individuals who are current or former employees of the facility's present owner (Athena). The Funeral Home Defendants similarly consist of the funeral home, and seven individuals who helped provide funeral services in Middlesex County.

Middlesex County is a far more convenient forum for the Defendants, and especially for the individual Defendants, than Hampden County. Therefore, the above-named Defendants respectfully request an order from this Court to transfer the case to Middlesex County.

THE DEFENDANTS,
COLONIAL HEALTH GROUP - ✓
WESTRIDGE, LLC, ✓ MICHAEL WALSH, ✓
WILLIAM MANTZOUKAS, ✓ RICHARD
KRAVETZ, ✓ JOHN KAIN, ✓ MICHAEL B.
LINCOLN, ✓ GINA QUEIROS, ✓ ANDREA B.
EDWARDS, ✓ DONNA DELCID, ✓ KAREN
SPERONI, ✓ CHRISTINE A. FRENCH, ✓
DENISE STEPHENSON, ✓ SAUDA
MATOVU, ✓ AND VINAY KUMAR, M.D. ✓

By Their Attorney,

William Fidurko (PTM)

William J. Fidurko, BBO #567064
fidurko@tsd-lawfirm.com
TUCKER, SALTSMAN, DYER, &
O'CONNELL, LLP
50 Congress Street
Boston, MA 02109
Phone: 617-986-6220
Fax: 617-986-6229

THE DEFENDANTS,
ATHENA HEALTH CARE SYSTEMS MA III ✓
LLC d/b/a MARLBOROUGH HILLS
HEALTHCARE CENTER, JAMES BOVE, ✓
VALERIE CHAKALOS-SANTILLI, ✓ DIANE
CURTIS, ✓ KEVIN DIEHL, ✓ LAURA DOSSANTOS, ✓
MICHAEL MOSIER, ✓ KAREN PETRUCELLI, ✓
LAWRENCE SANTILLI, ✓ DEBRA M. SOUCEY, ✓
AND THOMAS WALKUSKI ✓

By Their Attorneys,

Joseph M. Desmond

Joseph M. Desmond, BBO #634883
Philip J. Messier, BBO #688342
jdesmond@morrisonmahoney.com
pmessier@morrisonmahoney.com
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210-1181
Phone: 617-439-7500
Fax: 617-342-4935

THE DEFENDANTS,

JOHN EVERETT & SONS FUNERAL
HOME, ✓ JOSEPH T. EVERETT, ✓ DENNIS
CUNNINGHAM, ✓ SUSAN DAVIS, ✓
MAUREEN REEVE, ✓ BRIAN FALVEY, ✓
LUKE SIMPSON, ✓ AND RICHARD KELLY ✓

By Their Attorney,

Jeffrey L. McCormick

Jeffrey L. McCormick, BBO #329740
jmccormick@robinsondonovan.com
ROBINSON DONOVAN, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
Phone: 413-732-2301
Fax: 413-785-4658

DATE: 7/27/16

CERTIFICATE OF SERVICE

I, Philip J. Messier, do hereby certify that I have this day served the foregoing **MOTION TO TRANSFER CASE TO MIDDLESEX COUNTY** to all counsel of record and unrepresented parties in this action by mailing the same, by first class mail, postage prepaid to:

Coreen Goodwin, BBO #693188
Law Office of Coreen Goodwin
64 Donbray Road
Springfield, MA 01119

Melissa L. Curley, Esq.
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55 Pine Street, 5th Floor
Providence, RI 02903

William J. Fidurko, BBO #567064
50 Congress Street
Boston, MA 02109

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Morrison Mahoney LLP
250 Summer Street
Boston, MA 02210

John O. Mirick, BBO #349240
100 Front Street
Worcester, MA 01608

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Holyoke, MA 01040

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Jerome V. Sweeney III, BBO # 562119
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41 Mendon Avenue
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Sean P. Keough, BBO # 662771
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Joseph A. Keough, Jr. BBO # 561593
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Freedom Homes Realty
60 Harvard Street
Natick, MA 01760

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615 Concord Street
Framingham, MA 01702

Melissa L. Curley, BBO #655826
Plourde Bogue Moylan & Marino, LLP
55 Pine Street, 5th Floor
Providence, RI 02903

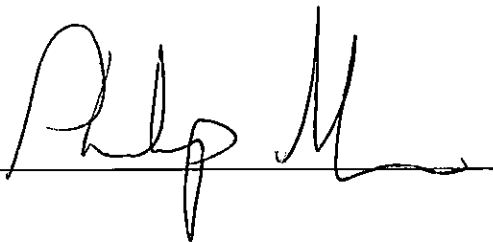
The Jowdy Group, Inc.
24 Wellington Drive
Westwood, MA 02090

Paul R. Piccioli
60 Harvard Street Extension, Apartment 2
Natick, MA 01760

Cynthia Bracciale
54 MacArthur Road
Natick, MA 01760

Harvey Weiner, BBO # 519840
Barton Centauro, BBO # 672965
Peabody & Arnold LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210

Date: 7/27/16

Attorney: 

NOTE - The Middlesex County Docket Sheet contains ten entries related to ATTORNEY APPEARANCES (Rows #21, 22, 23, 24, 25, 26, 27, 28, 29, and 30) indicating that the three Defense Counsel who allegedly conspired with all other defense counsel and defendants to file this allegedly fraudulent and forged July 27, 2016, MOTION TO TRANSFER (i.e., Former Attorney Messier, Former Attorney McCormick, and Attorney Fidurko) likely engaged in unlawful ex parte communications with the Middlesex County Superior Court on November 28, 2016, in alleged violation of S.J.C. Rule 3-09, Canon 2, Rule 2.9 (2016) – Ex Parte Communications; please see related Exhibits

COMMONWEALTH OF MASSACHUSETTS

HAMPDEN, SS.

SUPERIOR COURT DEPARTMENT
OF THE TRIAL COURT
CIVIL ACTION NO. 1579CV00917

SARAH A. OULTON,
Plaintiff

V.

CAROL B. HLADICK, et al.,
Defendants

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG - 1 2016


CLERK OF COURTS

MOTION TO TRANSFER CASE TO MIDDLESEX COUNTY

Defendants Colonial Health Group-Westridge, LLC ("Colonial"), Michael Walsh, William Mantzoukas, Richard Kravetz, John Kain, Michael B. Lincoln, Gina M. Queiros, Andrea B. Edwards, Donna DelCid, Karen M. Speroni, Christine A. French, Denise Stephenson, Sauda Matovu, Vinay Kumar, M.D., Athena Health Care Systems MA III LLC ("Athena"), James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Michael Mosier, Karen Petrucelli, Laura DosSantos, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski (together, "the Nursing Home Defendants") and John Everett & Sons Funeral Home, Joseph T. Everett, Dennis Cunningham, Susan Davis, Maureen Reeve, Brian Falvey, Luke Simpson, and Richard Kelly (together, "the Funeral Home Defendants") move that this case be transferred to Middlesex County which is a more convenient forum for the Defendants. All Defendants who

NOTE - The Hampden County Superior Court apparently marked this Motion to Transfer as Document #91, and referred to it as "#91" throughout various Docket Sheet entries, but the document was listed on the Docket Sheet as "File Ref Nbr. 95."

have appeared by counsel assent to this Motion.¹ See Exhibit 1, Assents to Transfer of Counsel who have Appeared.

The plaintiff previously filed her own motion to transfer this case to Middlesex County. See Exhibit 2, Plaintiff's Emergency Ex Parte Motion to Remove Action Due to Improper Venue, and Affidavit of Plaintiff Sarah A. Oulton in Support of Her Motion to Transfer Due to Improper Venue, dated March 17, 2016. This motion was denied by the Court without prejudice until service had been made. See Exhibit 3, Docket, at Page 1 of 8.

This is an action brought by Sarah Oulton against her siblings and brother-in-law and sixty-two other defendants. The Plaintiff asserts twenty-seven counts arising out of the treatment of her parents until their deaths in December 2012, the sale of her parents' home in November 2012, the funeral services and burial of her parents in December 2012, and the administration of her parents' estates. Suit was originally filed in December 2015. The time for service was several times extended by ex parte motions filed by the Plaintiff. The Plaintiff has now served most of the Defendants, although service does not appear to be complete on several Defendants who reside out of the Commonwealth.

The Oulton parents lived in Middlesex County. At the times of their deaths, they were residents in a nursing home in Middlesex County. The funeral services and burial were in Middlesex County. The alleged acts about which the Plaintiff complains occurred primarily in

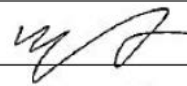
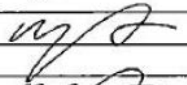
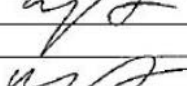
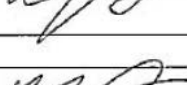
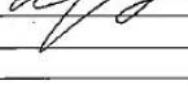
¹In filing this motion, the moving parties and all parties who have assented to the motion in no way waive, and explicitly reserve, any and all defenses that they may have that can be asserted under the Massachusetts Rules of Civil Procedure, including but not limited to improper service, applicable statutes of limitation, prior pending actions, collateral estoppel, and failure to state a claim. The sole intent of this motion is to transfer the case to Middlesex County, which is a more convenient forum for the resolution of the claims asserted by the plaintiff and the defenses to those claims.

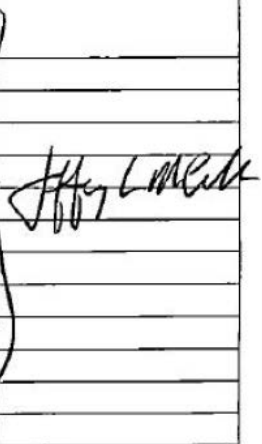
Middlesex County. The only party found in Hampden County is the Plaintiff, who assents to the transfer to Middlesex County.

The Nursing Home Defendants consist of the former and present owners of the nursing home: Colonial and Athena, respectively. The facility is located in Middlesex County. The nursing home defendants also consist of thirteen current or former Colonial employees who appear to have participated in the provision of services for the Oulton parents while they were residents there, and ten individuals who are current or former employees of the facility's present owner (Athena). The Funeral Home Defendants similarly consist of the funeral home, and seven individuals who helped provide funeral services in Middlesex County.

Middlesex County is a far more convenient forum for the Defendants, and especially for the individual Defendants, than Hampden County. Therefore, the above-named Defendants respectfully request an order from this Court to transfer the case to Middlesex County.

NOTE - Below, on this page -- for comparison to the allegedly FORGED signatures that appear on page 4 below -- are screenshots of the signatures of Attorney William Fidurko and Attorney Jeffrey McCormick taken from Middlesex Docket Sheet - 12 - Row 126 - File Ref Nbr. 17 - 2017-06-29 - Attendance Sheet - pp. 1 - 3

Colonial Health Group - Westridge LLC	1, 2, 5, 7, 8, 9, 10, 11	William Fidurko	
Lincoln, Michael	1, 2, 5, 8, 9, 11	"	
Quieros, Gina	1, 2, 5, 8, 9, 11	"	
Edwards, Andrea	1, 2, 5, 7, 8, 9, 10, 11	"	
Delcid, Donna	1, 2, 5, 8, 9, 10, 11	"	

John Everett & Sons Funeral Home	Dism. 6/20/17	Jeffrey McCormick	
Everett, Joseph	Dism. 6/20/17	Jeffrey McCormick	
Cunningham, Dennis	Dism. 6/20/17	Jeffrey McCormick	
Davis, Susan	8, 9, 11	Jeffrey McCormick	
Reeve, Maureen	8, 9, 11	Jeffrey McCormick	
Falvey, Brian	Dism. 6/20/17	Jeffrey McCormick	
Simpson, Luke	Dism. 6/20/17	Jeffrey McCormick	

THE DEFENDANTS,
COLONIAL HEALTH GROUP -
WESTRIDGE, LLC, MICHAEL WALSH,
WILLIAM MANTZOUKAS, RICHARD
KRAVETZ, JOHN KAIN, MICHAEL B.
LINCOLN, GINA QUEIROS, ANDREA B.
EDWARDS, DONNA DELCID, KAREN
SPERONI, CHRISTINE A. FRENCH,
DENISE STEPHENSON, SAUDA
MATOVU, AND VINAY KUMAR, M.D.

By Their Attorney,

William J. Fidurko (PJM)
William J. Fidurko, BBO #56706
fidurko@tsd-lawfirm.com
TUCKER, SALTSMAN, DYER, &
O'CONNELL, LLP
50 Congress Street
Boston, MA 02109
Phone: 617-986-6220
Fax: 617-986-6229

THE DEFENDANTS,
ATHENA HEALTH CARE SYSTEMS MA III
LLC d/b/a MARLBOROUGH HILLS
HEALTHCARE CENTER, JAMES BOVE,
VALERIE CHAKALOS-SANTILLI, DIANE
CURTIS, KEVIN DIEHL, LAURA DOSSANTOS,
MICHAEL MOSIER, KAREN PETRUCELLI,
LAWRENCE SANTILLI, DEBRA M. SOUCEY,
AND THOMAS WALKUSKI

By Their Attorneys,

Joseph M. Desmond
Joseph M. Desmond, BBO #63488
Philip J. Messier, BBO #688342
jdesmond@morrisonmahoney.com
pmessier@morrisonmahoney.com
MORRISON MAHONEY LLP
250 Summer Street
Boston, MA 02210-1181
Phone: 617-439-7500
Fax: 617-342-4935

NOTE - Attorney Desmond:
(1) was "cc'd" on the
allegedly sham Freeman-
Appeals Court Email &
Notice; (2) filed the first
allegedly fraudulent Motion
to Dismiss Appeal (Row
#376 of Middlesex Superior
Court Docket Sheet), and (3)
allegedly filed the allegedly
sham Freeman-Appeals
Court Notice in the
Middlesex Superior Court
on August 31, 2020 (listed at
Row #375 of the Middlesex
County Superior Court
Docket Sheet)

THE DEFENDANTS,

JOHN EVERETT & SONS FUNERAL
HOME, JOSEPH T. EVERETT, DENNIS
CUNNINGHAM, SUSAN DAVIS,
MAUREEN REEVE, BRIAN FALVEY,
LUKE SIMPSON, AND RICHARD KELLY

By Their Attorney,

Jeffrey L. McCormick
Jeffrey L. McCormick, BBO #329740
jmccormick@robinsondonovan.com
ROBINSON DONOVAN, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
Phone: 413-732-2301
Fax: 413-785-4658

DATE: 7/27/16

**NOTE - The signatures of Attorney
Fidurko and Attorney McCormick that
appear on this page are clearly not the
same as the signatures of Attorney
Fidurko and Attorney McCormick
depicted on the previous page, which
both were screen shot from the Middlesex
Superior Court Docket Sheet - Document
#12 - Row 126 - File Ref Nbr. 17 -
2017-06-29 - Attendance Sheet - pp. 1 - 3.**

**NOTE - THE MOTION DOES NOT
INCLUDE THE "EXHIBIT 1 - ASSENTS TO
TRANSFER OF COUNSEL WHO HAVE
APPEARED" DOCUMENT TO WHICH
FORMER ATTORNEY MESSIER AND
ATTORNEY DESMOND ALLEGEDLY
FRAUDULENTLY REFERRED ON PAGE 2
OF THIS MOTION**

CERTIFICATE OF SERVICE

I, **Philip J. Messier**, do hereby certify that I have this day served the foregoing **MOTION TO TRANSFER CASE TO MIDDLESEX COUNTY** to all counsel of record and unrepresented parties in this action by mailing the same, by first class mail, postage prepaid to:

Coreen Goodwin, BBO #693188
Law Office of Coreen Goodwin
64 Donbray Road
Springfield, MA 01119

William J. Fidurko, BBO #567064
50 Congress Street
Boston, MA 02109

John O. Mirick, BBO #349240
100 Front Street
Worcester, MA 01608

James Bailey Brislin, BBO #691999
50 Holy Family Road, #412
Holyoke, MA 01040

Jeffrey L. McCormick, BBO #329740
1500 Main Street, Suite 1600
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20 Causeway Street
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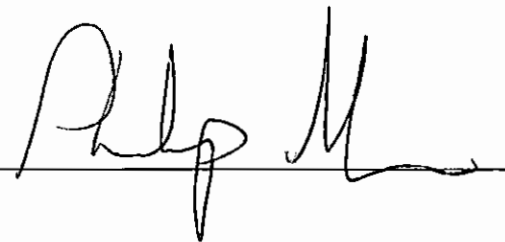
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Harvey Weiner, BBO # 519840
Barton Centauro, BBO # 672965
Peabody & Arnold LLP
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210

Date: 7/27/16

Attorney: 

NOTE - It appears that the Defense Attorneys allegedly involved in the allegedly fraudulent and forged July 27, 2016, MOTION TO TRANSFER may have engaged in unlawful ex parte communications with the Middlesex County Superior Court on November 28, 2016, in alleged violation of S.J.C. Rule 3-09, Canon 2, Rule 2.9 (2016) – Ex Parte Communications, because:

(1) the Oulton v. Hladick lawsuit had allegedly been ignored for months, in the Middlesex County Superior Court, following the allegedly fraudulent transfer of the case from Hampden County to Middlesex County;

(2) the Middlesex County Docket Sheet does not indicate that ANY “Event” was scheduled for November 28, 2016; and

(3) no party filed any pleading into the case on this date.

**Additional Information Related to
Alleged Fraud and Forgery on the
Allegedly Fraudulent and Forged July
27, 2016, Motion to Dismiss
on Which Former Attorney Messier
Allegedly Forged the Signatures of
Attorney Fidurko and Former
Attorney McCormick**

**LIST OF THE 30 APPELLEES WHO DID NOT HAVE ATTORNEYS
WHO FILED NOTICES OF APPEARANCE OR DID NOT FILE AN APPEARANCE
PRO SE ON OR BEFORE JULY 27, 2016, BUT WHO NEVERTHELESS -- WITH
THEIR ALLEGEDLY UNETHICAL COUNSEL -- ALLEGEDLY KNOWINGLY
PERPETRATED FRAUD ON THE COURT AND ON APPELLANT BY CREATING,
FILING, RELYING ON, AND BENEFITTING FROM THE
ALLEGEDLY FRAUDULENT AND FORGED MOTION TO TRANSFER,
IN ALLEGED VIOLATION OF
G.L. c. 267, § 1, G.L. c. 267, § 5, and G.L. c. 274, § 7**

1. Appellee **Carol B. Hladick** (Attorney David Denison Dishman, [BBO No. 126210]);
2. Appellee **Andrew Hladick** (Attorney David Denison Dishman, [BBO No. 126210]);
3. Appellee **Nancy J. Williams** (Attorney David Denison Dishman, [BBO No. 126210]);
4. Appellee **David P. Oulton** (Attorney David Denison Dishman, [BBO No. 126210]);
5. Appellee **Attorney Lisa A. Vecchio** (Attorney Courtney A. Longo [BBO No. 666466], Attorney Amanda Mathieu [BBO No. 690736], and Attorney Kenneth B. Walton [BBO No. 562174]);
6. Appellee **Mirick O'Connell DeMallie & Lougee, LLP¹** (ALLEGEDLY HAD NO LAWFUL ATTORNEY, AT ANY TIME, GIVEN THAT ATTORNEY JOHN O. MIRICK [BBO NO. 349240] ALLEGEDLY VIOLATED MASSACHUSETTS SUPERIOR COURT RULE 12 AND MASS. R. PROF. C. 3.7 IN UNDERTAKING THE REPRESENTATION OF THIS APPELLEE);
7. Appellee **Attorney Jason A. Port²** (ALLEGEDLY HAD NO LAWFUL ATTORNEY, AT ANY TIME, GIVEN THAT ATTORNEY JOHN O. MIRICK [BBO NO. 349240] ALLEGEDLY VIOLATED MASSACHUSETTS SUPERIOR COURT RULE 12 AND MASS. R. PROF. C. 3.7 IN UNDERTAKING THE REPRESENTATION OF THIS APPELLEE);
8. Appellee **Attorney Arthur P. Bergeron³** (ALLEGEDLY HAD NO LAWFUL ATTORNEY, AT ANY TIME, GIVEN THAT ATTORNEY JOHN O. MIRICK [BBO NO. 349240])

¹ The "representation" of Appellee Mirick O'Connell DeMallie & Lougee, LLP by Appellee Attorney Mirick is alleged to have been unlawful because Appellee Attorney Mirick allegedly undertook the representation of Appellee Mirick O'Connell DeMallie & Lougee, LLP in alleged violation of Superior Court Rule 12 and Mass. R. Prof.. C. 3.7.

² The "representation" of Appellee Attorney Port is alleged to have been unlawful because Appellee Attorney Mirick allegedly undertook the representation of Appellee Attorney Port in alleged violation of Superior Court Rule 12 and Mass. R. Prof.. C. 3.7.

³ The "representation" of Appellee Attorney Bergeron is alleged to have been unlawful because Appellee Attorney Mirick allegedly undertook the representation Appellee Attorney Bergeron in alleged violation of Superior Court Rule 12 and Mass. R. Prof.. C. 3.7.

ALLEGEDLY VIOLATED MASSACHUSETTS SUPERIOR COURT RULE 12 AND MASS. R. PROF. C. 3.7 IN UNDERTAKING THE REPRESENTATION OF THIS APPELLEE);

9. Appellee **Freedom Homes Realty** (NO ATTORNEY APPEARANCE WAS EVER FILED FOR THIS APPELLEE AT ANY TIME IN EITHER COURT, EITHER PRO SE OR THROUGH COUNSEL, AND NO PLEADING WAS EVER LAWFULLY FILED BY THIS APPELLEE AT ANY TIME);

10. Appellee **Paul R. Piccioli** (NO ATTORNEY APPEARANCE WAS EVER FILED FOR THIS APPELLEE AT ANY TIME IN EITHER COURT, EITHER PRO SE OR THROUGH COUNSEL, AND NO PLEADING WAS EVER LAWFULLY FILED BY THIS APPELLEE AT ANY TIME);

11. Appellee **Law Office of Philip C. Brown, Esq.** (NO ATTORNEY APPEARANCE WAS EVER FILED FOR THIS APPELLEE AT ANY TIME IN EITHER COURT, EITHER PRO SE OR THROUGH COUNSEL, AND NO PLEADING WAS EVER LAWFULLY FILED BY THIS APPELLEE AT ANY TIME);

12. Appellee **Attorney Philip C. Brown** (NO ATTORNEY APPEARANCE WAS EVER FILED FOR THIS APPELLEE AT ANY TIME IN EITHER COURT, EITHER PRO SE OR THROUGH COUNSEL, AND NO PLEADING WAS EVER LAWFULLY FILED BY THIS APPELLEE AT ANY TIME);

13. Appellee **Plourde, Bogue, Moylan & Marino, LLP**⁴ (ALLEGEDLY HAD NO LAWFUL ATTORNEY, AT ANY TIME, GIVEN THAT ATTORNEY THOMAS MOYLAN [BBO NO. 564781] AND ATTORNEY MELISSA CURLY [BBO NO. 655826] ALLEGEDLY VIOLATED MASSACHUSETTS SUPERIOR COURT RULE 12 AND MASS. R. PROF. C. 3.7 IN UNDERTAKING THE REPRESENTATION OF THIS APPELLEE);

14. Appellee **The Law Office of Deborah Masterson** (Attorney Barton Eugene Centauro [BBO No. 672965], and Attorney John J. O'Connor [BBO 555251]);

15. Appellee **A.A. Dority Company, Inc.** (Attorney Brian James O'Connor [BBO No. 69104], and Attorney Kevin John O'Connor [BBO No. 555249]);

16. Appellee **Jeffrey W. Crawford** (Attorney Brian James O'Connor [BBO No. 691004], and Attorney Kevin John O'Connor [BBO No. 555249]);

17. Appellee **Winston Law Group, LLC** (Attorney Scott Douglas Burke [BBO No. 551255], Attorney Matthew Gallagher [BBO No. 688528], Attorney Rebecca Anne Green Robinson [BBO No. 670529], Attorney Laura L. Edwards [BBO No. 670520], Attorney Steven J. Bolotin [BBO No. 564085], and Attorney Tory Andrew Weigand [BBO No. 548553]);

⁴ The "representation" of Appellee Plourde, Bogue, Moylan & Marino, LLP is alleged to have been unlawful because both Appellee Attorney Moylan and Appellee Attorney Curley allegedly undertook the representation of Appellee Plourde, Bogue, Moylan & Marino, LLP in alleged violation of Superior Court Rule 12 and Mass. R. Prof. C. 3.7

18. Appellee **Keough + Sweeney, Ltd.** (Attorney Jillian E. McGrath [BBO No. 691101], Attorney Doyle C. Valley [BBO No. 638578], Attorney Colin Barrett [BBO No. 690726], and Attorney Jacqueline Ann Welch [BBO No. 554111]);
19. Appellee **Attorney Jerome V. Sweeney II** (Attorney Jillian E. McGrath [BBO No. 691101], Attorney Doyle C. Valley [BBO No. 638578], Attorney Colin Barrett [BBO No. 690726], and Attorney Jacqueline Ann Welch [BBO No. 554111]);
20. Appellee **Attorney Jerome V. Sweeney III** (Attorney Jillian E. McGrath [BBO No. 691101], Attorney Doyle C. Valley [BBO No. 638578], and Attorney Colin Barrett [BBO No. 690726]);
21. Appellee **Attorney Sean P. Keough** (Attorney Jillian E. McGrath [BBO No. 691101], Attorney Doyle C. Valley [BBO No. 638578], Attorney Colin Barrett [BBO No. 690726], and Attorney Jacqueline Ann Welch [BBO No. 554111]);
22. Appellee **Attorney Joseph A. Keough, Jr.** (Attorney Jillian E. McGrath [BBO No. 691101], Attorney Doyle C. Valley [BBO No. 638578], Attorney Colin Barrett [BBO No. 690726], and Attorney Jacqueline Ann Welch [BBO No. 554111]);
23. Appellee **Michael Walsh** (Attorney William J. Fidurko [BBO No. 567064]);
24. Appellee **William Mantzoukas** (Attorney William J. Fidurko [BBO No. 567064]);
25. Appellee **Richard Kravetz** (Attorney William J. Fidurko [BBO No. 567064]);
26. Appellee **John Kain** (Attorney William J. Fidurko [BBO No. 567064]);
27. Appellee **Vinay Kumar, M.D.** (Attorney William J. Fidurko [BBO No. 567064]);
28. Appellee **The Jowdy Group, Inc.** (Attorney John William Chamberlain [BBO No. 632784], and Attorney Stephen J. Duggan [BBO No. 137610]);
29. Appellee **Alexander R. Jowdy** (Attorney John William Chamberlain [BBO No. 632784], and Attorney Stephen J. Duggan [BBO No. 137610]); and
30. Appellee **Cynthia Bracciale** (Attorney Thomas Whitney Beliveau [BBO No. 548001]).

LIST OF THE 36 APPELLEES WHO WERE REPRESENTED BY COUNSEL ON OR BEFORE JULY 27, 2016, BUT WHO NEVERTHELESS -- WITH THEIR ALLEGEDLY UNETHICAL COUNSEL -- ALLEGEDLY KNOWINGLY PERPETRATED FRAUD ON THE COURT AND ON APPELLANT BY CREATING, FILING, RELYING ON, AND BENEFITTING FROM THE ALLEGEDLY FRAUDULENT AND FORGED MOTION TO TRANSFER, IN ALLEGED VIOLATION OF G.L. c. 267, § 1, G.L. c. 267, § 5, and G.L. c. 274, § 7

1. Appellee **Athena Health Care Systems MA III LLC d/b/a Marlborough Hills Healthcare Center** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], Attorney Jason Tsoutsouras [BBO No. 690488], and Attorney Justin Amos [BBO No. 697232]);
2. Appellee **James Bove** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
3. Appellee **Valerie Chakalos-Santilli** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
4. Appellee **Diane Curtis** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
5. Appellee **Kevin Diehl** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
6. Appellee **Laura DosSantos** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
7. Appellee **Michael Mosier** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
8. Appellee **Karen Petrucelli** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
9. Appellee **Lawrence Santilli** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
10. Appellee **Debra M. Soucey** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
11. Appellee **Thomas Walkuski** (Former Attorney Philip Messier [BBO No. 688342], Attorney Joseph M. Desmond [BBO No. 634883], and Attorney Jason Tsoutsouras [BBO No. 690488]);
12. Appellee **Colonial Health Group – Westridge, LLC d/b/a Marlborough Hills Healthcare Center** (Attorney William J. Fidurko [BBO No. 567064]);
13. Appellee **Michael B. Lincoln** (Attorney William J. Fidurko [BBO No. 567064]);

14. Appellee **Gina M. Queiros** (Attorney William J. Fidurko [BBO No. 567064]);
15. Appellee **Andrea B. Edwards** (Attorney William J. Fidurko [BBO No. 567064]);
16. Appellee **Donna DelCid** (Attorney William J. Fidurko [BBO No. 567064]);
17. Appellee **Karen Speroni** (Attorney William J. Fidurko [BBO No. 567064]);
18. Appellee **Christine French** (Attorney William J. Fidurko [BBO No. 567064]);
19. Appellee **Denise Stephenson** (Attorney William J. Fidurko [BBO No. 567064]);
20. Appellee **Sauda Matovu** (Attorney William J. Fidurko [BBO No. 567064]);
21. Appellee **Dennis R. Brown, P.C.** (Attorney Courtney A. Longo [BBO No. 666466], Attorney Kenneth B. Walton [BBO No. 562174], and Attorney Amanda Mathieu [BBO No. 690736]);
22. Appellee **Attorney Dennis R. Brown** (Attorney Courtney A. Longo [BBO No. 666466], and Attorney Kenneth B. Walton [BBO No. 562174]);
23. Appellee **Attorney John O. Mirick** (Attorney John O. Mirick [BBO No. 349240]);
24. Appellee **John Everett & Sons Funeral Home** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);
25. Appellee **Joseph Everett** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);
26. Appellee **Dennis Cunningham** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);
27. Appellee **Susan Davis** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740], and Attorney Jeffrey John Trapani [BBO No. 661094]);
28. Appellee **Maureen Reeve** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740], Attorney Jeffrey Lawrence Adams [BBO No. 690567], and Attorney Jeffrey John Trapani [BBO No. 661094]);
29. Appellee **Brian Falvey** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);
30. Appellee **Luke Simpson** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);
31. Appellee **Richard Kelly** (Former Attorney Jeffrey Lefferts McCormick [BBO No. 329740]);

32. Appellee **Attorney Thomas Moylan**¹ (Attorney Thomas J. Moylan [BBO No. 564781]);
33. Appellee **Attorney Melissa Curley**² (Attorney Melissa L. Curley [BBO No. 655826]);
34. Appellee **Attorney Deborah Masterson** (Attorney Barton Eugene Centauro [BBO No. 672965], Attorney Harvey Weiner [BBO No. 519840], and Attorney John J. O'Connor [BBO 555251]);
35. Appellee **Attorney Neal Winston** (Attorney Matthew Gallagher [BBO No. 688528], Attorney Scott Douglas Burke [BBO No. 551255], Attorney Steven J. Bolotin [BBO No. 564085], and Attorney Tory Andrew Weigand [BBO No. 548553]); and
36. Appellee **Attorney Michael Couture** (Attorney Matthew Gallagher [BBO No. 688528], Attorney Scott Douglas Burke [BBO No. 551255], Attorney Rebecca Anne Green Robinson [BBO No. 670529], Attorney Steven J. Bolotin [BBO No. 564085], and Attorney Tory Andrew Weigand [BBO No. 548553]).

¹ **NOTE** - Attorney Curley entered a Notice of Appearance for Attorney Moylan on 2016-06-20 and 2017-03-06, in alleged violation of Superior Court Rule 12 and Mass. R. Prof. C. 3.7, and -- like every other Appellee -- she allegedly never lawfully filed any document at any time.

² **NOTE** - Attorney Moylan entered a Notice of Appearance for Attorney Curley on 2016-06-20 and 2017-03-06, in alleged violation of Superior Court Rule 12 and Mass. R. Prof. C. 3.7, and Attorney Moylan neither appeared in any court, at any time, but -- like every other Appellee -- he allegedly never lawfully filed any document at any time.

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #78

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.
Plaintiffs,

v.

Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG - 3 2016


CLERK OF COURTS

**PLAINTIFFS' EX PARTE MOTION TO ACCEPT PROOF OF SERVICE OF PROCESS
ON FOUR OUT-OF-STATE DEFENDANTS BY AFFIDAVITS FROM THE
RHODE ISLAND DIVISION OF SHERIFFS**

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), who respectfully move this court to accept proof of service of process on four out-of-state defendants ([1] Keough + Sweeney, Ltd., [2] Attorney Jerome V. Sweeney III, [3] Attorney Sean P. Keough, and [4] Attorney Joseph A. Keough, Jr.) (the "Keough + Sweeney Rhode Island Defendants") by means of Affidavits from the Rhode Island Division of Sheriffs. In support of this Motion Plaintiffs state the following:

1. On July 18, 2016, Rhode Island Division of Sheriffs Deputy Ray Nardolillo ("Deputy Nardolillo") effected service of process on the Keough + Sweeney Rhode Island Defendants by delivering four Summonses, four copies of the Verified Complaint and Demand for Jury Trial (the "Complaint"), and four copies of the Amended Verified Complaint and Demand for Jury Trial (the "Amended Complaint") to them at the law office of Keough + Sweeney, Ltd., located at 41 Mendon Avenue, Pawtucket, Rhode Island 02861.

2. Also on July 18, 2016, Rhode Island Division of Sheriffs Clerk Ann Molloy (“Clerk Molloy”) mailed the four Returns of Service for the Keough + Sweeney Rhode Island Defendants to Attorney Coreen Goodwin’s office address of 64 Donbray Road, Springfield, MA 01119.

3. As of August 3, 2016, the Returns of Service completed by the Deputy Nardolillo and mailed by Clerk Molloy have not been delivered to Attorney Goodwin. Although Attorney Goodwin and Clerk Molloy confirmed Attorney Goodwin’s correct mailing address and Clerk Molloy did, in fact, deposit the documents in the U.S. Mail, the Returns of Service for the Keough + Sweeney Rhode Island Defendants have not arrived at Attorney Goodwin’s office and are now presumed to be “lost” in the U.S. Mail.

4. Clerk Molloy has completed four Affidavits confirming that on July 18, 2016, service of process was properly made on each of the Keough + Sweeney Rhode Island Defendants by Deputy Nardolillo. Clerk Molloy’s original Affidavits are attached hereto as **Exhibit 1.**

5. Attorney Goodwin made a good faith effort to generate copies of the Returns of Service that Clerk Molloy mailed, but learned that reproduction of the Returns of Service would not be possible. Clerk Molloy informed Attorney Goodwin that the Rhode Island Division of Sheriffs does not, customarily, retain copies of Returns of Service and did not, therefore, retain a copy of the Returns of Service completed by Deputy Nardolillo prior to Clerk Molloy’s deposit of those documents in the U.S. Mail.

6. Attorney Goodwin also made a good faith effort to generate a “replacement” set of Returns of Service. However, Clerk Molloy stated that there is no way to create new versions of the Returns of Service, even if Attorney Goodwin were to deliver replacement, blank

Summonses to the Rhode Island Division of Sheriffs office.

7. Clerk Molloy informed Attorney Goodwin that the only way to generate “replacement” Returns of Service would be for Attorney Goodwin to deliver a second set of four Summonses, four copies of the Complaint, and four copies of the Amended Complaint to the Rhode Island Division of Sheriffs, and for Deputy Nardolillo to serve these “replacement” documents on the Keough + Sweeney Rhode Island Defendants, once again, at the law office of Keough + Sweeney, Ltd. at 41 Mendon Avenue, Pawtucket, Rhode Island 02861.

8. If Plaintiffs were required to reproduce another set of four Summonses, four copies of the Complaint, and four copies of the Amended Complaint and deliver those documents to the Rhode Island Division of Sheriffs for re-service on the Keough + Sweeney Rhode Island Defendants, the costs required would unduly burden Plaintiffs.

9. The costs required to re-serve a “replacement” set of four Summonses, four copies of the Complaint, and four copies of the Amended Complaint on the Keough + Sweeney Rhode Island Defendants would be unduly burdensome in light of the fact that the Keough + Sweeney Rhode Island Defendants were, in fact, properly served process on July 18, 2016, and in light of the fact that Clerk Molloy has prepared Affidavits confirming that service of process was properly effected on the Keough + Sweeney Rhode Island Defendants on July 18, 2016.

WHEREFORE, Plaintiffs move that the court accept proof of service of process on the Keough + Sweeney Rhode Island Defendants by means of Affidavits from the Rhode Island Division of Sheriffs.

Dated: August 3, 2016

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON, SARAH A. OULTON ON BEHALF OF THE ESTATE OF DONALD PAUL OULTON, and SARAH A. OULTON ON BEHALF OF THE ESTATE OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY



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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #79

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al.,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 10 2016


CLERK OF COURTS

**PLAINTIFFS' EX PARTE MOTION TO FILE LATE RETURNS OF SERVICE ON THE FOUR
KEOUGH + SWEENEY – RHODE ISLAND DEFENDANTS**

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton (“Plaintiffs”), who respectfully request that this court permit Plaintiffs to file late Returns of Service on the four Keough + Sweeney-Rhode Island defendants (Keough + Sweeney, Ltd., Attorney Jerome V. Sweeney III, Attorney Sean P. Keough, and Attorney Joseph A. Keough, Jr.) (the “Keough + Sweeney-Rhode Island Defendants”). As grounds for this motion Plaintiffs state the following:

1. On July 18, 2016 the Keough + Sweeney-Rhode Island Defendants were served copies of the Verified Complaint and Demand for Jury Trial and the Amended Complaint and Demand for Jury Trial by Rhode Island Sheriffs Deputy Ray Nardolillo (“Deputy Nardolillo”).
2. Also on July 18, 2016, Rhode Island Division of Sheriffs Clerk Ann Molloy (“Clerk Molloy”) mailed the four Returns of Service for the Keough + Sweeney Rhode Island Defendants to Attorney Coreen Goodwin’s office address of 64 Donbray Road, Springfield, MA 01119.
3. The Returns of Service prepared by Deputy Nardolillo were subsequently lost in the U.S. Mail.
4. Subsequent to the loss of the Returns of Service in the U.S. Mail, Clerk Molloy prepared

Affidavits stating that the Rhode Island Division of Sheriffs effected service of process on the Keough + Sweeney-Rhode Island Defendants on July 18, 2016.

5. On August 3, 2016, Plaintiffs filed an **EX PARTE MOTION TO ACCEPT PROOF OF SERVICE OF PROCESS ON FOUR OUT-OF-STATE DEFENDANTS BY AFFIDAVITS FROM THE RHODE ISLAND DIVISION OF SHERIFFS.**

6. On August 7, 2016, the Returns of Service prepared by Deputy Nardolillo and mailed to Attorney Goodwin by Clerk Molloy were located. The envelope containing the Returns of Service indicates that Clerk Molloy mistakenly addressed the envelope to Plaintiff Sarah Oulton (at Attorney Goodwin's office address) rather than to Attorney Goodwin at Attorney Goodwin's office address (**Exhibit 1**).

7. The delivery of the Returns of Service to Attorney Goodwin was delayed as a result of Clerk Molloy's error because the U.S. Post Office staff did not promptly deliver them to Attorney Goodwin.

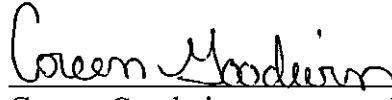
8. Having now located the Returns of Service completed by the Rhode Island Division of Sheriffs, Plaintiffs seek permission to file those documents despite the fact that the deadline for filing has passed.

WHEREFORE Plaintiffs respectfully request that this court permit Plaintiffs to file late the Returns of Service on the Keough + Sweeney Rhode Island Defendants that were erroneously lost in the U.S. Mail.

Dated: August 10, 2016.

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON,
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF DONALD PAUL OULTON, and
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY,



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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #80

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917


Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al.,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 10 2016


CLERK OF COURTS

**PLAINTIFFS' EMERGENCY *EX PARTE* MOTION TO ENLARGE TO OCTOBER 1, 2016,
THE DEADLINE FOR SERVICE OF PROCESS BY PUBLICATION FOR DEFENDANT
JAMES BOVE AND TO ORDER PUBLICATION IN THE *BOSTON HERALD* NEWSPAPER**

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), who respectfully move this court, pursuant to Mass.R.Civ.P. 6(b)(1), to: (1) enlarge the deadline for service of process on Defendant James Bove by publication until October 1, 2016, and (2) order that publication be made in the *Boston Herald* newspaper. As grounds for this motion Plaintiffs state the following:

1. As of this date, the Verified Complaint and Demand for Jury Trial and the Amended Verified Complaint and Demand for Jury Trial have been served on 65 of the 66 Defendants in this case.
2. On July 11, 2016, this court ordered Defendant James Bove, whose last known address is 2100 Dorchester Avenue, Dorchester, MA, to be served by publication in the *Dorchester Reporter* newspaper.
3. The current deadline for service of process is August 15, 2016.
4. Counsel for Defendant James Bove filed a Notice of Appearance for Defendant James Bove.

5 Although Plaintiffs successfully served process on five other defendants (Arthur Bergeron, Vinay Kumar, M.D., Denise Stephenson, Richard Kravetz, and John Kain) through publication in various other periodicals, service of process on Defendant James Bove by publication in the *Dorchester Reporter* has been impossible for Plaintiffs to effect. Messages left with the staff of the newspaper have not been returned to Plaintiffs' counsel. There is no "direct line" for the paper's "Legal Notices" Department, and Plaintiffs are concerned that the *Dorchester Reporter* may not publish them at all.

6. Plaintiff have made alternate arrangements to serve Defendant James Bove through publication in the *Boston Herald*, and steps to effect publication in the *Boston Herald* will be taken as soon as this court orders it.

7. On August 10, 2016, Plaintiffs stipulated to an extension to October 21, 2016, of the time by which responsive pleadings are due from Defendant James Bove.

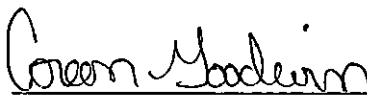
8. Since an attested copy of the Order of Notice of Publication must be published once each week for three consecutive weeks prior to the deadline for the filing of responsive pleadings, an extension of the deadline for service of Defendant James Bove by publication is required. Because publication requires first obtaining the Orders of Publication from this court and then publishing the Orders for three consecutive weeks, Plaintiffs will be unable to meet the deadline for service of process on Defendant James Bove unless the deadline for such service of process is extended until October 1, 2016.

WHEREFORE, Plaintiffs respectfully request that this court enlarge the deadline for service of process on Defendant James Bove by publication until October 1, 2016, and to order that publication be made in the *Boston Herald* newspaper.

Dated: August 10, 2016.

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON,
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF DONALD PAUL OULTON, and
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY,



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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #81

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al.,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 10 2016


CLERK OF COURTS

**PLAINTIFFS' EX PARTE MOTION TO ACCEPT LATE FILING OF
PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO TRANSFER
CASE TO MIDDLESEX COUNTY**

#91

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), who respectfully move, pursuant to Mass.R.Civ.P. 6(b)(2), that this court accept the late filing of Plaintiffs' Opposition to Defendants' Motion to Transfer Case to Middlesex County filed by Plaintiffs on August 5, 2016. As grounds for this motion Plaintiffs state the following:

1. On July 27, 2016, Attorneys Joseph M. Desmond and Philip J. Messier filed, on behalf of Defendants Athena Health Care Systems MA III LLC d/b/a Marlborough Hills Healthcare Center, James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Laura DosSantos, Michael Mosier, Karen Petrucelli, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski, an Affidavit of Compliance with Superior Court Rule 9A stating that a Motion to Transfer Case to Middlesex County had been served on Plaintiffs' counsel on April 1, 2016, and that Attorneys Desmond and Messier had "received no timely opposition to this motion."

2. The Affidavit of Compliance filed by Attorneys Desmond and Messier is false. Plaintiffs were not served the motion to transfer the case to Middlesex County on April 1, 2016.

3. On July 10, 2016, Plaintiffs' counsel received, via U.S. Mail, the first of two versions of Defendants' motion to transfer the case to Middlesex County because it would be a "more convenient forum" to the defendants on behalf of whom the motion was to be filed.

4. The motion received on July 10, 2016, incorrectly stated that Plaintiffs assented to Defendants' motion to transfer of the case to Middlesex County.

5. On July 11, 2016, Plaintiffs' counsel, Attorney Goodwin, notified Defendants' Attorneys Fidurko, McCormick, Desmond, and Messier via email that Plaintiff did not assent to the transfer of the case to Middlesex County.

6. On July 11, 2016, Defendants mailed a revised version of the motion to transfer the case to Middlesex County.

7. Defendants' Motion to Transfer Case to Middlesex County did not arrive at the offices of Plaintiffs' counsel until at least July 16, 2016. At the time Plaintiffs' counsel, Attorney Brislin, was on Paternity Leave, caring for his ill newborn child, and Attorney Goodwin was on a pre-arranged vacation out of state.

8. When Attorney Goodwin returned to the office in early August she filed Plaintiffs' Opposition to Defendants' Motion to Transfer Case to Middlesex County, however, due to the excusable neglect of Plaintiffs' counsel, Plaintiffs' Opposition was not filed within 10 days after service of the motion on Plaintiffs' counsel.

9. Plaintiffs have stipulated to an extension to September 1, 2016, (and October 21, 2016, for Defendant James Bove) of the deadline for the filing of responsive pleadings.

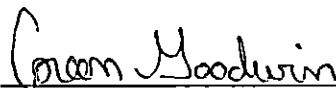
10. Defendants will not be unduly burdened by the court's acceptance of the late filing of Plaintiffs' Opposition to Defendants' Motion to Transfer Case to Middlesex County.

WHEREFORE, Plaintiffs respectfully request that this court accept the late filing of Plaintiffs' Opposition to Defendants' Motion to Transfer Case to Middlesex County filed by Plaintiffs on August 5, 2016.

Dated: August 10, 2016.

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON,
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF DONALD PAUL OULTON, and
SARAH A. OULTON ON BEHALF OF
THE ESTATE OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY,



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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #82

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss..

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs

v.

Carol B. Hladick, et al.,
Defendants

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 12 2016


CLERK OF COURTS

ORDER OF NOTICE BY PUBLICATION

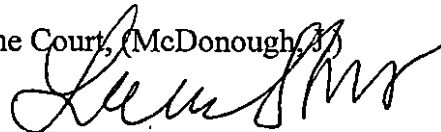
This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Attorney Arthur P. Bergeron, whose last known business address was 1800 West Park Drive, Suite 400, Westborough, MA 01581 by publishing an attested copy of this order once each week for three consecutive weeks in the Worcester Telegram, a newspaper published in the City of Worcester at least twenty days before the 1st of September, 2016, and that said Defendant, Attorney Arthur P. Bergeron, do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Attorney Arthur P. Bergeron, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claim in any other action.

Dated this 12th day of July, 2016

By the Court, (McDonough, J.)



Laura S. Gentile, Esquire
Clerk of Courts

8/25/16
Atty to provide Orig. Tear Sheets
NA/KS

8-12-16

89.

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT
HAMPDEN, ss. DOCKET NO. 1579CV00917

Sarah A. Oulton, et al., Plaintiffs
v.
Carol B. Hladick, et al., Defendants

ORDER OF NOTICE BY PUBLICATION

This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Attorney Arthur P. Bergeron, whose last known business address was 1800 West Park Drive, Suite 400, Westborough, MA 01581 by publishing an attested copy of this order once each week for three consecutive weeks in the Worcester Telegram, a newspaper published in the City of Worcester at least twenty days before the 1st of September, 2016, and that said Defendant, Attorney Arthur P. Bergeron, do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Attorney P. Bergeron, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claims in any other action.

Dated this 12th day of July, 2016
By the Court, (McDonough, J.)
Laura S. Gentile, Esquire
Clerk of Courts
July 20, July 27, August 3, 2016

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT
HAMPDEN, ss. DOCKET NO. 1579CV00917

Sarah A. Oulton, et al., Plaintiffs
v.
Carol B. Hladick, et al., Defendants

ORDER OF NOTICE BY PUBLICATION

This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Attorney Arthur P. Bergeron, whose last known business address was 1800 West Park Drive, Suite 400, Westborough, MA 01581 by publishing an attested copy of this order once each week for three consecutive weeks in the Worcester Telegram, a newspaper published in the City of Worcester at least twenty days before the 1st of September, 2016, and that said Defendant, Attorney Arthur P. Bergeron, do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Attorney P. Bergeron, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claims in any other action.

Dated this 12th day of July, 2016
By the Court, (McDonough, J.)
Laura S. Gentile, Esquire
Clerk of Courts
July 20, July 27, August 3, 2016

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT
HAMPDEN, ss. DOCKET NO. 1579CV00917

Sarah A. Oulton, et al., Plaintiffs
v.
Carol B. Hladick, et al., Defendants

ORDER OF NOTICE BY PUBLICATION

This cause came to be heard upon the motion of the plaintiff, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said defendant, Attorney Arthur P. Bergeron, whose last known business address was 1800 West Park Drive, Suite 400, Westborough, MA 01581 by publishing an attested copy of this order once each week for three consecutive weeks in the Worcester Telegram, a newspaper published in the City of Worcester at least twenty days before the 1st of September, 2016, and that said Defendant, Attorney Arthur P. Bergeron, do cause his written appearance to be entered and his written answer and other lawful pleadings to be filed in the office of the Clerk of said Court in Springfield in Hampden County on or before September 1, 2016. If you Attorney P. Bergeron, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a) your answers must state as a counterclaim any claim which you have against the plaintiff, Sarah A. Oulton and Sarah A. Oulton on behalf of the estate of Carol Jane Oulton and on behalf of the estate of Donald Paul Oulton which arises out of the transaction or occurrence that is the subject matter of the plaintiff's claim or you will thereafter be barred from making such claims in any other action.

Dated this 12th day of July, 2016
By the Court, (McDonough, J.)
Laura S. Gentile, Esquire
Clerk of Courts
July 20, July 27, August 3, 2016

**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #83

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 22 2016


CLERK OF COURTS

**PLAINTIFFS' MOTION FOR RECONSIDERATION
OF ORDER TO TRANSFER CASE TO MIDDLESEX COUNTY**

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Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), and hereby move this Court for reconsideration of its Order of August 12, 2016, allowing the Motion to Transfer Case to Middlesex County (the "Motion to Transfer") filed by Defendants Colonial Health Group-Westridge, LLC ("Colonial"), Michael Walsh, William Mantzoukas, Richard Kravetz, John Kain, Michael B. Lincoln, Gina M. Queiros, Andrea B. Edwards, Donna DelCid, Karen M. Speroni, Christine A. French, Denise Stephenson, Sauda Matovu, Vinay Kumar, M.D., Athena Health Care Systems MA III LLC ("Athena"), James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Michael Mosier, Karen Petrucelli, Laura DosSantos, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski (together "the Nursing Home Defendants"), John Everett & Sons Funeral Home, Joseph T. Everett, Dennis Cunningham, Susan Davis, Maureen Reeve, Brian Falvey, Luke Simpson, and Richard Kelly (together "the Funeral Home Defendants") and assented to by Defendants Michael Couture, Neal Winston, Winston Law Group, LLC, Deborah Masterson, The Law Office of Deborah Masterson, Thomas Moylan, Melissa Curley, Plourde Bogue Moylan & Marino, LLP, Dennis R. Brown, P.C., Dennis R. Brown, and Lisa Vecchio (together, "the 44 of 66 Defendants"). As grounds for this Motion

for Reconsideration Plaintiffs state the following:

INTRODUCTION

This Court, in its Order of August 12, 2016, allowing the Motion to Transfer filed by the 44 of 66 Defendants (the “Order”), noted that Plaintiff Sarah A. Oulton, herself, moved to transfer this Matter to Middlesex County on March 17, 2016, and stated “in her motion, supported by affidavit, that the events that gave rise to this action occurred primarily in Middlesex County, that numerous defendants reside or have their principal places of business in that county, that real property that is a subject of this action is in that county, and that there were other related matters then pending in the Middlesex County Probate and Family Court.” Plaintiffs now move for reconsideration on the grounds that new evidence has been discovered between March 17, 2016, and August 18, 2016. Combined with the evidence of the Defendants’ abuse of process, possible collusion with court staff, and their willingness to brazenly defraud the Middlesex County Court system that was previously presented in the Amended Verified Complaint and Demand for Jury Trial (the “Complaint”), this new evidence indicates that the Middlesex County Court System serves as a RICO enterprise through which the Defendants engaged in their pattern of racketeering and through which Plaintiffs’ constitutionally guaranteed rights to due process and equal protection of the laws have been violated. The acts of Middlesex County Court personnel described herein, some of which occurred after this Court issued its Order, shock the conscience or offend the community’s sense of fair play and decency. Because transfer of the case to Middlesex County would be grossly prejudicial to Plaintiffs, Plaintiffs respectfully request that the Motion to Transfer filed by the 44 of 66 Defendants be reconsidered and denied.

ARGUMENT

1. Defendant Attorney John Mirick (“Attorney Mirick”), whose colleagues at Mirick O’Connell DeMallie & Lougee, LLP (“Mirick O’Connell”) Attorney Jason Port (“Attorney Port”) and Attorney Arthur Bergeron (“Attorney Bergeron”) were involved in the RICO scheme at the heart of this

lawsuit since its inception, is a former Chair of the Massachusetts Board of Bar Overseers.

2. Fifteen of the 66 defendants in this case are attorneys licensed to practice law in the Commonwealth of Massachusetts, all of whom currently practice or have practiced law in Middlesex County. In the instant case, these attorneys did not hesitate to defraud the Middlesex County Probate and Family Court, the Middlesex County Superior Court, the Middlesex County Registry of Deeds, Medicare, MassHealth, the Internal Revenue Service, the Massachusetts Department of Revenue, and the U.S. Department of Housing and Urban Development in order to further their illicit objectives.

3. Although a government agency cannot be named as a defendant person under the RICO statute, a government agency may still serve as the enterprise through which a RICO defendant engages in a pattern of racketeering. See, e.g., *United States v. Urban*, 404 F.3d 754, 770 (3d Cir.), *cert. denied*, 546 U.S. 1030 (2005) (“we have frequently found government entities to be ‘enterprises’ for RICO purposes”); *Averbach v. Rival Mfg. Co.*, 809 F.2d 1016, 1018 (3d Cir.1987) (noting that court can be an “enterprise”); *United States v. Bacheler*, 611 F.2d 443, 450 (3d Cir.1979) (holding that Philadelphia Traffic Court can be an “enterprise”); *United States v. Freeman*, 6 F.3d 586, 597 (9th Cir. 1993), *cert. denied*, 511 U.S. 1077 (1994) (“a governmental entity may constitute an ‘enterprise’ within the meaning of RICO”); *United States v. Angelilli*, 660 F.2d 23, 33 (2d Cir. 1981), *cert. denied*, 455 U.S. 910 (1982) (New York City Civil Court was an actionable enterprise); *United States v. Baker*, 617 F.2d 1060, 1061 (4th Cir. 1980) (County Sheriff’s office was an actionable enterprise).

4. “Legal entities” that may serve as RICO enterprises include not only private corporations and partnerships but also include governmental entities, such as municipal corporations, agencies, and other units of government. See, e.g., *United States v. Urban*, 404 F.3d 754, 770 (3d Cir.), *cert. denied*, 546 U.S. 1030 (2005) (“we have frequently found government entities to be ‘enterprises’ for RICO purposes”); *United States v. Freeman*, 6 F.3d 586, 597 (9th Cir. 1993), *cert. denied*, 511 U.S. 1077 (1994) (“a governmental entity may constitute an ‘enterprise’ within the meaning of RICO”);

Genty v. Resolution Trust Corp., 937 F.2d 899, 906-07 (3d Cir. 1991) (An enterprise may be a public entity, like Gloucester Township”); *United States v. Angelilli*, 660 F.2d 23, 33 (2d Cir. 1981), *cert. denied*, 455 U.S. 910 (1982) (New York City Civil Court was an actionable enterprise); *United States v. Baker*, 617 F.2d 1060, 1061 (4th Cir. 1980) (County Sheriff’s office was an actionable enterprise); *Ferluga v. Eickhoff*, 408 F.Supp.2d 1153, 1162 (D. Kan. 2006) (the government structure of the City of Edwardsville, Kansas was an actionable enterprise); *Eli Lilly and Co. v. Roussel Corp.*, 23 F.Supp. 2d 460, 489 (D.N.J. 1998) (FDA was an actionable enterprise).

5. The Fourteenth Amendment of the United States Constitution prohibits states from depriving any person of life, liberty, or property without due process of law and from denying to any person within their jurisdiction the equal protection of the laws. The Equal Protection Clause reaches the exercise of state power however manifested, whether exercised directly or through subdivisions of the state. Although the forms and functions of local government and the relationships among the various units are matters of state concern, a state’s political subdivisions must comply with the Fourteenth Amendment.¹

6. The U.S. Supreme Court has set forth three factors that normally determine whether an individual has received the “process” that the Constitution finds “due.” First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the government’s interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail. By weighing these concerns, courts can determine whether a state has met the fundamental requirement of due process — the opportunity to be heard at a meaningful time and in a meaningful manner².

¹ *Avery v. Midland County, Texas*, 390 U.S. 474, 88 S.Ct. 1114, 20 L.Ed.2d 45 (1968), on remand 430 S.W.2d 487 (Tex.1968)

² *Mathews v. Eldridge*, 424 U.S. 319, 333, 96 S.Ct. 893, 901, 47 L.Ed.2d 18 (1976). Where car was towed and stored for alleged parking violation, thirty day delay in holding hearing did not violate due process. *City of Los Angeles v. David*, 538 U.S. 715, 123 S.Ct. 1895, 155 L.Ed.2d 946 (2003). City official’s alleged conduct resulting in demolition of property deprived owner of procedural due process.

7. The Defendants have used the Middlesex County Court System as a RICO enterprise through which they engaged in their pattern of racketeering, in violation of Plaintiffs' civil rights and much to the detriment of Plaintiffs.

**The Middlesex County Court System Served as the Enterprise
Through Which the RICO Defendants Engaged in a Pattern of Racketeering
Prior to March 17, 2016**

8. Plaintiff Sarah A. Oulton attempted to protect her parents, Donald Paul Oulton ("Donald") and Carol Jane Oulton ("Carol") (together, "the Oultons") by filing Petitions for Conservator in the Middlesex County Probate and Family Court in January 2012. The Defendants, after filing a number of fraudulent pleadings in that court in order to contest the Petitions for Conservator, ultimately fraudulently induced Plaintiff Sarah A. Oulton to dismiss the Petitions for Conservator in July 2012.

9. In March 2012, Attorney Port filed fraudulent pleadings that appended the fraudulent Affidavits of Marlborough Hills employees Michael Lincoln ("Lincoln") and Vinay Kumar, M.D., ("Kumar") (**Exhibits 73, 74, and 75** of the Complaint) in the Middlesex County Probate and Family Court, and Attorney Port made a number of false statements before the court as he desperately contested the Petitions for Conservator that Plaintiff Sarah A. Oulton filed on behalf of Donald and Carol.

10. On August 8, 2012, Attorney Port and Attorney Bergeron forced Donald and Carol (who were falsely imprisoned in Marlborough Hills without valid contracts for services after Carol was overdosed by Marlborough Hills staff during her first 24 hours in residency) to execute void Durable Powers of Attorney from the Alzheimer's Unit of Marlborough Hills (**Exhibits 116 and 117** of the Complaint). Mirick O'Connell recorded the Void Durable Power of Attorney of Carol in the Middlesex County Registry of Deeds at Book 60174, Page 501, on October 4, 2012 and recorded the Void Durable

Gallant v. City of Fitchburg, 739 F. Supp. 2d 39 (D. Mass. 2010).

Power of Attorney of Donald was recorded in the Middlesex County Registry of Deeds at Book 60174, Page 494, on October 4, 2012.

11. Attorney Port and Attorney Bergeron were working to further the objectives of C. Hladick, N. Williams, David Oulton (“D. Oulton”), Andrew Hladick (“A. Hladick”) (together the “Sibling Defendants”), not Donald and Carol. Upon information and belief, the Sibling Defendants converted the assets of Donald and Carol for months prior to their deaths, thus the Defendants were highly motivated to prevent the appointment of a disinterested third-party Conservator to oversee the Oultons’ financial affairs.

12. On September 21, 2012, a void Mortgage in the amount of \$100,988.50 was executed by N. Williams, granting the Oultons’ jointly-held Oulton Home (54 MacArthur Road, Natick, Massachusetts), as collateral for said Mortgage to Colonial Health Group-Westridge, LLC, a Massachusetts Limited Liability Company doing business as Marlborough Hills Healthcare Center, with Mortgage covenants (the “Void Mortgage of Marlborough Hills”) (Exhibit 120 of the Complaint). The Void Mortgage of Marlborough Hills was recorded in the Middlesex County Registry of Deeds at Book 60174, Page 520, on October 4, 2012, and it also contains a notation, at the top of Page 1, indicating that the document is to be returned to Mirick O’Connell after recording. The Discharge of the Void Mortgage of Marlborough Hills was recorded in the Middlesex County Registry of Deeds at Book 80660, Page 495 on November 21, 2012, and it also contains a notation, at the top of Page 1, indicating that the document is to be returned to Mirick O’Connell after recording.

13. On September 21, 2012, N. Williams executed a Mortgage in the amount of \$7,000.00, granting the Oultons’ jointly-held home as collateral for said Mortgage to Mirick O’Connell, with Mortgage covenants (the “Void Mortgage of Mirick O’Connell”). The Void Mortgage of Mirick O’Connell (Exhibit 121 of the Complaint) was recorded in the Middlesex County Registry of Deeds at Book 60174, Page 508, on October 4, 2012, and it also contains a notation, at the top of Page 1,

indicating that the document is to be returned to Mirick O'Connell after recording. The Discharge of the Void Mortgage of Mirick O'Connell was recorded in the Middlesex County Registry of Deeds at Book 60660, Page 493 on November 21, 2012.

14. Notably, both the Void Mortgage of Marlborough Hills and the Void Mortgage of Mirick O'Connell were discharged before the date on which the alleged "sale" (i.e., the fraudulent conveyance) of the Oulton Home was transacted by the Defendants.

15. On November 16, 2012, a void Quitclaim Deed with Quitclaim Covenants (the "Void Quitclaim Deed") (Exhibit 122 of the Complaint) was executed by N. Williams, in violation of G. L. c. 183 § 39³. The execution of the Void Quitclaim Deed did not take place before "at least one subscribing witness," in violation of G. L. c. 183 § 39. The Void Quitclaim Deed was prepared by Mirick O'Connell. The Void Quitclaim Deed was recorded in the Middlesex County Registry of Deeds at Book 60550, Page 485, on November 21, 2012. The Void Quitclaim Deed also contains a notation, at the top of Page 1, indicating that the document is to be returned to Attorney Philip C. Brown ("Attorney P.C. Brown"), (an attorney with a Massachusetts Board of Bar Overseers disciplinary history related to improprieties with his real estate practice) after recording.

16. On November 29, 2012, Attorney Port sent a letter to N. Williams indicating that "[t]he total proceeds from the sale of the property was \$208,896.45," however Attorney Michael Couture ("Attorney Couture"), the fraudulently-appointed fiduciary of the Estate of Carol, claimed, in various "DRAFT" Accounts that he gave to Plaintiff Sarah A. Oulton and her legal counsel, that Mirick O'Connell "held" \$216,026.29 of the Oultons' funds in its IOLTA account between November 2012 and August 2013. Through the fraudulent conveyance of the Oulton Home and recording of all related documents in the Middlesex County Court System, Mirick O'Connell converted at least \$216,026.29 of the Oultons' funds to its IOLTA account and to its own use (from at least November 2012 through

³ **M.G.L.c. 183 § 39: Proof of Execution of Deed; Necessity of Subscribing Witness.** The execution of a deed shall not be proved in the manner before provided unless it has at least one subscribing witness.

August 2013), misused those funds intentionally with the intent to deprive Donald, Carol, the Estate of Donald, the Estate of Carol, and Plaintiff Sarah A. Oulton, individually, of their funds at least temporarily, and with actual deprivation of Donald, Carol, the Estate of Donald, the Estate of Carol, and Plaintiff Sarah A. Oulton, individually, resulting. Although it was clear that the proceeds of the fraudulent conveyance of the Oulton Home would not be promptly disbursed, Mirick O'Connell did not deposit them into a segregated, interest-bearing account in the name of Donald and Carol.

17. According to the Mirick O'Connell DeMallie & Lougee, LLP ("Mirick O'Connell") invoice of August 2, 2013 (Exhibit 127 of the Complaint), planning for the funerals of Donald and Carol by Defendants Attorney Bergeron, Carol B. Hladick ("C. Hladick"), Nancy J. Williams ("N. Williams"), and others began at least as early as December 5, 2012. This date was 14 days before the date on which Donald allegedly died at Marlborough Hills, 20 days before the date on which Carol allegedly died at Marlborough Hills, and only eight days after Mirick O'Connell Attorney Port sent a letter to N. Williams purporting to describe the distribution of the Oultons' assets that were converted by the Defendants (Exhibit 128 of the Complaint).

18. Also according to the Mirick O'Connell invoice (Exhibit 127 of the Complaint), on December 17, 2012, two days before the date on which Donald allegedly died and 8 days before the date on which Carol allegedly died, Attorney Bergeron "review[ed] Discharge from Middlesex Savings [Bank] (where some of Donald's and Carol's jointly-held assets were held)" and exchanged "correspondence with 'opposing counsel' regarding [a] Discharge from Middlesex Savings [Bank]" that was likely related to the unauthorized use of Donald's and Carol's funds by the Sibling Defendants).

19. The Mirick O'Connell invoice (Exhibit 127 of the Complaint) also reveals that Attorney Bergeron billed for a conference regarding the Oultons' "life insurance and probate issues" on December 19, 2012, while Carol and Donald were still living.

20. From the time of the deaths of Donald and Carol in December 2012 forward, numerous Defendants, including C. Hladick, N. Williams, D. Oulton, Attorney Jerome V. Sweeney II (“Attorney Sweeney-2”), Attorney Jerome V. Sweeney III (“Attorney Sweeney-3”), Attorney Sean P. Keough (“Attorney S. Keough”), Attorney Joseph P. Keough (“Attorney J. Keough”), Attorney Bergeron, Attorney Port, Marlborough Hills administrators Lincoln , Gina Queiros (“Queiros”), Michael Walsh (“Walsh”), William Mantzoukas (“Mantzoukas”), Richard Kravetz (“Kravetz”), John Kain (“Kain”), Attorney Thomas Moylan (“Attorney Moylan”), Attorney Melissa Curley, Attorney Deborah Masterson (“Attorney Masterson”), and possibly others unknown at this time – acting in their capacity as executors de son tort – willfully concealed both the Will of Donald and the Will of Carol (each of which was drafted by Attorney Sweeney-2) from Attorney Alan Lehman (the Executor chosen by Donald and named in the Will of Donald) and Attorney Gerard Mahaney (the Executor chosen by Carol and named in the Will of Carol), in violation of G.L. c.190B § 2-516.

21. Upon information and belief, the Sibling Defendants converted the assets of Donald and Carol for months prior to their deaths, thus the Defendants were highly motivated to prevent the appointment of the Executors named in the Oultons’ Wills to oversee the Estate of Donald and the Estate of Carol. The Defendants’ top priority was controlling the Oultons’ “probate issues” in order to conceal the abuse of the Oultons and the theft from their estates both before and after they died. Ample evidence of the scheming by the executors de son tort is apparent in the invoices of Mirick O’Connell (**Exhibit 127** of the Complaint) and Plourde Bogue Moylan and Marino LLP (“PBMM”) (**Exhibit 143** of the Complaint).

22. On March 26, 2013, **92 days** after the date on which Carol died, a fraudulent Petition for Informal Probate opened the Estate of Carol in Middlesex County Probate and Family Court . Attorney Moylan, a personal friend who shared an office floor with Attorney Sweeney-2, filed a Petition for Informal Probate of Will and Appointment of Personal Representative for the Estate of Carol (the

“Petition for Informal Probate of the Estate of Carol”), together with the Will of Carol and a fraudulent Codicil of Carol Jane Oulton (the “Codicil of Carol”). The Codicil of Carol was drafted by Attorney Sweeney-2 for the sole purpose of naming Attorney Sweeney-2 as Executor of the Estate of Carol. The Codicil of Carol, however, referenced a prior-dated Will of Carol, rather than the Will of Carol at bar. Although signed by both Attorney Moylan and Attorney Sweeney-2 “under the penalties of perjury,” the Petition for Informal Probate of the Estate of Carol falsely stated that “Attorney Jerome Sweeney II” is the Personal Representative named in the Will of Carol.

23. On April 23, 2013, Plaintiff went to Middlesex County Probate and Family Court to get a copy of the Petitions for Conservator docket sheets (Exhibit 146 of the Complaint) for her Board of Bar Examiners Application. On this day a clerk at the Probate Court summoned Plaintiff over to the Clerk’s counter and notified Plaintiff that there was “something funny” going on in the Probate matter for the Estate of Carol. The Probate clerk informed Plaintiff that, in addition to the Alleged Will of Carol an irregular Codicil (the “Fraudulent Codicil of Carol”) (Exhibit 147 of the Complaint) was offered in Carol’s probate matter. The Clerk also gave Plaintiff a copy of the judge’s case notes which flagged that something with the Codicil was amiss.

24. On April 25, 2013, only two days AFTER the kind Probate Clerk informed Plaintiff that Attorney Moylan and Attorney Sweeney-2 filed the Petition for Informal Probate of the Alleged Will of Carol, Plaintiff filed a Petition for Formal Probate In Re Estate of Carol Oulton requesting that disinterested third party be appointed Personal Representative (“Plaintiff’s Petition for Formal Probate of the Alleged Will of Carol”) (Exhibit 149 of the Complaint).

25. Quite alarmingly, while inside the Middlesex County Probate and Family Court, a file clerk named Gail pulled Plaintiff aside and said, “*Sarah, you seem like a nice girl. I need to let you know that in this courthouse, if you have enough money, you can get whatever you need. Just be careful.*”

26. On May 10, 2013, Attorney Sweeney-2 – who claims to be PBMM’s “client,” and who has tried unsuccessfully on multiple occasions to be appointed fiduciary billed the Estate of Carol Oulton \$300.00 on the PBMM invoice (Exhibit 143 of the Complaint) for a task described as: *“travel to probate court to review file and discuss issues with clerk.”* Attorney Sweeney-2 billed an additional \$900.00 to attend the hearing at which his Petition to be named Personal Representative of the Estate of Carol was denied. He has unsuccessfully attempted on multiple occasions, in his capacity as executor de son tort, to get appointed as fiduciary of the Estate of Carol, and on May 10, 2013, he had no lawful authority to *“travel to probate court to review file and discuss issues with clerk.”*

27. On May 31, 2013, 164 days after the date on which Donald died and 67 days after filing the Petition for Informal Probate of the Estate of Carol, Attorney Moylan also filed a fraudulent Petition for Formal Probate of Will and Appointment of Personal Representative for the Estate of Donald (the “Petition for Formal Probate of the Estate of Donald”), together with the Will of Donald and a fraudulent Codicil of Donald Paul Oulton (the “Codicil of Donald”). The Codicil of Donald was drafted by Attorney Sweeney-2 for the sole purpose of naming Attorney Sweeney-2 as Executor of the Estate of Donald. Although signed by both Attorney Moylan and Attorney Sweeney-2 “under the penalties of perjury,” the Petition for Informal Probate of the Estate of Donald falsely stated that “Attorney Jerome Sweeney II” is the Personal Representative named in the Will of Donald. As stated above, Attorney Alan Lehman is the Executor named in the Will of Donald who had priority to serve at the time of Donald’s death.

28. On July 25, 2013, through fraud perpetrated on the Middlesex County Probate and Family Court by the executors de son tort who intermeddled in both the Estate of Carol and the Estate of Donald (the Sibling Defendants, Attorney Sweeney-2, Mirick O’Connell attorneys Arthur Bergeron (“Attorney Bergeron”), Jason Port (“Attorney Port”), John Mirick (“Attorney Mirick”), Attorney Masterson, Marlborough Hills Administrator Michael Lincoln (“Lincoln”), and likely others, Attorney

Couture was appointed as Special Personal Representative (“SPR”) of the Estate of Carol. Evidence of the Defendants’ months of scheming to arrange the fraudulent appointment of Attorney Couture as SPR is seen in the invoices discussed above. The Defendants had been planning to perpetrate their fraud on the Middlesex County Probate and Family Court since prior to the Oultons’ deaths. A transcript of the hearing held on July 25, 2013, is found as Exhibit 165 of the Complaint.

29. Attorney Couture and his co-conspirators were highly motivated to hide the conversion of the Oultons’ assets that took place long before they died. Upon information and belief, Plaintiff’s three siblings converted the assets of Donald and Carol while Donald and Carol were falsely imprisoned in Marlborough Hills, starting in December 2011, therefore the Inventory filed by Attorney Couture 600 days after the date on which the Inventory was due, pursuant to G.L. c. 190B § 3-706⁴, is fraudulent, for it does not account for the Oultons’ assets that were stolen by Attorney Couture’s co-conspirators. Attorney Couture had knowledge of his co-conspirators’ thefts from the Oultons and worked to conceal the thefts from Plaintiff and her counsel. Those stolen assets are part of the Oultons’ estates and would have been properly listed in the Inventory if not for Attorney Couture’s and his co-conspirators’ criminal acts.

30. On September 12, 2013, Attorney Couture argued a Motion to Allow Special Personal Representative Fees and Payment of Creditors’ Claims in Middlesex County Probate and Family Court. Attorney Couture did not serve proper notice of the hearing or serve a copy of the motion to be argued to Plaintiff; rather, he sent only a copy of a Notice of Hearing. Even in his invoice for that task (Exhibit 178 of the Complaint) Attorney Couture makes no mention of serving the motion (and its

⁴ G.L. c. 190B § 3-706. [Duty of Personal Representative; Inventory and Appraisalment.]

Within 3 months after appointment, a personal representative, who is not a successor to another representative who has previously discharged this duty, shall prepare an inventory of property owned by the decedent at the time of death, listing it with reasonable detail, and indicating as to each listed item, its fair market value as of the date of the decedent’s death, and the type and amount of any encumbrance that may exist with reference to any item.

The personal representative shall file with the court or mail to all interested persons whose addresses are reasonably available a copy of the inventory. The personal representative may also file the original of the inventory with the court.

attached invoices from Attorney Couture's co-conspirators) because Attorney Couture never served those on Plaintiff prior to the hearing. In the invoice, he deceptively refers to it as simply a "Motion for Fees." Plaintiffs were prejudiced by Attorney Couture's withholding of the pleading he argued on September 12, 2013.

		<u>Hours</u>	
08/23/2013	JB	Filed Motion for SPR Fees at Middlesex Probate/Scheduled Motion for Hearing.	0.80 140.00
08/28/2013	GM	Telephone conference with clerk regarding rescheduling hearing for motion of fees.	0.20 25.00
08/29/2013	GM	Preparation of Notice of Hearing and letters to interested parties via certified mail.	1.00 125.00

31. Through fraud and evasion, and by defying the Massachusetts Rules of Civil Procedure, Attorney Couture sought (and was granted by Middlesex County Probate and Family Court Judge DiGangi) permission to pay \$74,103.67 from the Estate of Carol for the following invoices:

- a. Marlborough Hills \$69,426.54;
- a. Mirick O'Connell \$1,964.63; and
- a. Attorney Couture \$2,712.50.

32. In an effort to facilitate the improper payments made to his co-conspirators (Marlborough Hills and Mirick O'Connell) and himself, Attorney Couture intentionally withheld the Motion to Allow Special Personal Representative Fees and Payment of Creditors' Claims from Plaintiff. Plaintiff received only the Notice of Hearing on September 10, 2013, which was only two days before the hearing. On August 29, 2013, Attorney Couture drafted a deceptive letter to Plaintiff transmitting only the Notice of Hearing (in which Attorney Couture speciously referred to the motion to be argued as a "Motion for Fees.") No mention of Attorney Couture's intent to pay alleged "creditors" claims was made, nor was any mention made of the amount of fees (or alleged "creditors" claims) sought. In violation of Mass. R. Civ. P. 5 (a), as amended, 463 Mass. 1401

(2012)⁵ and Mass. R. Civ. P. 6 (c), 365 Mass. 747 (1974)⁶, Attorney Couture did not serve on Plaintiff a copy of his Motion to Allow Special Personal Representative Fees and Payment of Creditors' Claims or any of its exhibits (i.e., the invoices of Mirick O'Connell DeMallie & Lougee LLP ["Mirick O'Connell"], Marlborough Hills, and Winston Law Group). Moreover, Plaintiff did not receive Attorney Couture's deceptive letter transmitting the Notice of Hearing until September 10, 2013, only two days before the hearing. Not by accident, Attorney Couture wrote in the letter, "[p]lease be advised that you do not have to attend this hearing." The opposition that Plaintiff prepared was not in opposition to the Motion to Allow Special Personal Representative Fees and Payment of Creditors' Claims because Attorney Couture withheld that pleading from Plaintiff. All disbursements made by Attorney Couture to his co-conspirators for their "legal services" were unlawful under G.L. c. 190B § 3-713 because the transaction were affected by Attorney Couture's substantial conflict of interest (in that the payments were made to himself and his co-conspirators) and Plaintiff did not consent to the payments after fair disclosure. A transcript of the hearing is found at Exhibit 192 of the Complaint.

33. On October 5, 2013, Plaintiff filed a Motion to Disqualify the Law Firms of Keough + Sweeney, Ltd., Plourde Bogue Moylan & Marino, LLP, and Dennis R. Brown, P.C. from this case (Exhibit 183 of the Complaint) in the Middlesex County Probate and Family Court. The responsive pleadings filed by the Defendants were fraudulent.

34. On October 7, 2013, Attorney Couture was the first to execute a Stipulation of Dismissal Pursuant to MCRP 41(a)(1)(ii)⁷ filed in the Lawsuit of Marlborough Hills v. The Estate of Carol in

⁵ **Mass.R.Civ.P. Rule 5: Service and Filing of Pleadings and Other Papers.**

(a) **Service: When Required.** Except as otherwise provided in these Rules . . . every written motion other than one which may be heard *ex parte* . . . shall be served upon each of the parties.

(b) **Same: How Made.** . . . Service . . . upon a party shall be made by delivering a copy to him or by mailing it to him at his last known address. . . .

⁶ **Mass.R.Civ.P. Rule 6. Time: (c) For Motions-Affidavits.** A written motion, other than one which may be heard *ex parte*, and notice of the hearing thereof shall be served not later than 7 days before the time specified for the hearing, unless a different period is fixed by these rules or by order of the court. . . .

⁷ **Mass.R.Civ.P. Rule 41: Dismissal of Actions.**

(a) **Voluntary Dismissal: Effect Thereof.**

(1) **By Objector; By Stipulation.** Subject to the provisions of these rules and of any statute of this

Middlesex Superior Court. Attorney Masterson signed a counterpart and then filed both documents in Middlesex County Superior Court on October 16, 2013. For months Attorney Couture refused to provide Plaintiff a copy of the lawsuit that Attorney Masterson filed in Middlesex Superior Court, and when he did – only because Plaintiff’s counsel repeatedly made requests for documentation – Attorney Couture withheld from Plaintiff the Stipulation of Dismissal (dismissing the suit with prejudice, forfeiting all rights of appeal) and the Summons (with waiver of service of process) (**Exhibit 184** of the Complaint). Only when Plaintiff traveled to Middlesex County Superior Court on March 11, 2014, to review the court file did Plaintiff learn that Attorney Couture had been eager, much to the detriment of the Estate of Carol, to: (1) voluntarily accept service of the Complaint that Attorney Masterson filed against the Estate of Carol; and (2) stipulate to the dismissal of the suit with prejudice, “**ALL PARTIES WAIVING THEIR RIGHT TO APPEAL.**” Quite notably, Attorney Couture’s invoice in which he billed for this “service” (**Exhibit 178** of the Complaint) makes no reference to the Stipulation of Dismissal. Instead, reference is made to simply a “letter.”

10/07/2013			
GM	Preparation of letter and certified mailing to Attorney Masterson.	0.30	37.50

35. On October 17, 2013, a hearing on Plaintiff’s Motion to Disqualify the Law Firms of Keough + Sweeney, Ltd., Plourde Bogue Moylan & Marino, LLP, and Dennis R. Brown, P.C. from this case was held in Middlesex County Probate and Family Court. Judge DiGangi did not issue a ruling on the Motion. Judge DiGangi directed the attorneys against whom the Plaintiff moved to “call the BBO. If they feel that there’s a conflict let the court know. Let the moving party know. . . . If they don’t feel that there’s a conflict, you might want to get a letter from them indicating that. As soon as you get that letter, let me know and I’ll, I’ll act, either way on the, uh, request. A transcript of this hearing is found

Commonwealth, an action may be dismissed by the Objector without order of court. . . .

(ii) by filing a stipulation of dismissal signed by all parties who have appeared in the action. Unless otherwise stated in the notice of dismissal or stipulation, the dismissal is without prejudice, except that a notice of dismissal operates as an adjudication upon the merits when filed by a Objector who has once dismissed in any court of the United States or of this or any other state an action based on or including the same claim.

at **Exhibit 192** of the Complaint. The invoices submitted against the Estate of Carol reveal that the Defendants had been in frequent contact, and Plaintiff did not learn of Attorney Mirick's status as former Chair of the BBO until many months later.

36. Despite his stating that he "would act on the request," Judge DiGangi took no action to disqualify the firms or rule on Plaintiff's Motion to Disqualify. As of this August 18, 2016, no ruling has been made (EXHIBIT 1).

37. On December 16, 2013, Attorney David K. Barley counsel for Petitioner ("Counsel"), filed his Entry of Appearance with this court.

38. On December 31, 2013, Counsel and Petitioner visited the Middlesex County Probate and Family Court in order to review the documents in the case file. Specifically, Counsel and Petitioner visited the court to procure copies of documents that were filed but not served on Petitioner by Attorney Deborah Masterson, Attorney Michael Couture, Attorney Melissa Curley, and Attorney Jerome V. Sweeney II. Quite notably, none of the numerous motions filed by the Defendants in the Middlesex County Probate and Family Court "In Re Estate of Carol Jane Oulton" case has ever been timely served on Plaintiff in compliance with the Massachusetts Rules of Civil Procedure Rule 6., therefore Plaintiff does not have copies of all of the pleadings that have been filed in the case. On December 31, 2013, Counsel and Petitioner observed the case file had been reduced to one small manila folder and most of the documents previously submitted to the court by Petitioner were missing from the file.

39. On January 20, 2014, Plaintiff's counsel filed three motions with the Middlesex County Probate and Family Court to be argued at the January 30, 2014, hearing already on the docket:

(a) **Petitioner Sarah A. Oulton's Motion for a Ruling on Petitioner Sarah A. Oulton's' Motion to Disqualify the Law Firms of Keough & Sweeney, Plourde Bogue Moylan & Marino LLP, and Dennis R. Brown, P.C. Argued 10-17-2013;**

(b) Petitioner Sarah A. Oulton's Motion to Strike the Written Affidavit of Objections of Creditor Colonial Health Group-Westridge LLC, d/b/a Marlborough Hills Healthcare Center and the Affidavit of Objections of Jerome V. Sweeney II Pursuant to G.L. c. 190B § 1-401(e); and

(c) Petitioner Sarah A. Oulton's Motion for an Order to Restore Case File in its Entirety.

40. On January 30, 2014, given that so much of the case file for the case was already "missing," Plaintiff's counsel brought extra copies of his motions to court. As predicted, Plaintiff's motions were missing from the case file and would not have been heard by Judge Abber if Plaintiff's counsel had not brought a spare copy of each.

41. The Motion for an Order to Restore Case File in its Entirety said, in relevant part:

1. As of at least December 31, 2013, the case file is missing many of the documents that have been filed since the case commenced on March 26, 2013.

2. Petitioner has not served certain pleadings in this case, in violation of the Massachusetts Rules of Probate Court and Massachusetts Rules of Civil Procedure, and those pleadings are missing from the file.

3. Petitioner will be unfairly prejudiced in this case and related cases if Counsel cannot review all of the documents that have been argued and filed in the case file.

4. Petitioner will be unfairly prejudiced if the records of the case file that were lost through the violation of M.G.L. 268 §13E are not restored.

42. A transcript of the hearing from January 30, 2014, is attached as Exhibit Complaint as **Exhibit 237**. Quite notably, Judge Abber did not rule on the Motion to Disqualify that was still pending. With respect to the three Motions filed by Plaintiff Sarah A. Oulton, the following was said:

JUDGE ABBER: Okay, so I'll do that. I have your motion to disqualify this law firm. I don't know if that's moot, or if you want it to go back to Judge, uh, DiGangi for a ruling on it, but, if it's, isn't it really moot at this point?

MELISSA CURLEY: [unintelligible]

DAVID BARTLEY: Well, uh.... I don't think it is moot, Your Honor.

JUDGE ABBER: Well, I'll give that to Judge DiGangi. It will certainly be moot with the appointment, correct?

DAVID BARTLEY: Well, uh, with the appointment it would be.

JUDGE ABBER: I have a motion to strike the written Affidavit of the creditor and, uh, the Affidavit of Objections of Mr. Sweeney. That would also be moot, would it not?

DAVID BARTLEY: No, no Your Honor, that is, that is not moot!

JUDGE ABBER: If I strike the written Affidavit of Objections of the creditor, what happens?

DAVID BARTLEY: It would be a great benefit to my, to my client.

JUDGE ABBER: How so?

DAVID BARTLEY: My client is about to take the Mass. Bar Exam. As you know, that there is a character and fitness review. And those Affidavits, Your Honor, they are well, one, they're not relevant, because they speak about a different matter, but they are completely slanderous based upon not personal knowledge, but based upon hearsay, Your Honor. I believe they're still in the file, um...
[emphasis added]

JUDGE ABBER: Are you asking that they be impounded or stricken?

DAVID BARTLEY: Impounded.

JUDGE ABBER: Well, you've gotta comply with the Standing Order. Because whether I strike them or not, they're still part of the file and part of the public record. If you want to impound them, you have to comply with the Standing Order.

DAVID BARTLEY: Fair enough, Your Honor. Thank you.

JUDGE ABBER: And a motion to restore the case file in its entirety. Now, I've read this and you're alleging that certain documents are missing from the file? If that's the case, you need to address that with the Register of Probate. That is not an issue for this Court. We do not maintain these files. The Register of Probate is in charge of maintaining the file. You have to go through her if you feel that this file is not complete.

DAVID BARTLEY: Okay, Your Honor.

JUDGE ABBER: I mean, that happens often because public access is

here so they can address it through the scanning of documents.

DAVID BARTLEY: Your Honor, thank you.

43. Since January 30, 2014, Plaintiff's counsel tried numerous times – unsuccessfully, thus far – to communicate with Registrar Tara DeCristofaro in order to rectify the issues related to the Motion to Strike the Written Affidavit of Objections of Creditor Colonial Health Group-Westridge LLC, d/b/a Marlborough Hills Healthcare Center and the Affidavit of Objections of Jerome V. Sweeney II Pursuant to G.L. c. 190B § 1-401(e) and the Motion for an Order to Restore Case File in its Entirety.

44. The Registrar of Probate and her staff did not return telephone calls to Plaintiff's counsel and were always "out of the office" on the several occasions that Plaintiff and her counsel traveled to the Middlesex County Probate and Family Court to rectify the issues. To date, no action has been taken on those three Motions argued on January 30, 2014, and no ruling by Judge DiGangi on Plaintiff's Motion to Disqualify, argued on October 17, 2013, has ever been made.

45. On July 2, 2015, Attorney Goodwin also filed a Notice of Appearance in the Middlesex County Probate and Family Court case for the Estate of Carol and for the case still open for Plaintiff's father, In Re: Estate of Donald P. Oulton, (MI13P2822EA). Both Notices of Appearance were received by court personnel and time-stamped to reflect that the Notice of Appearance was filed on July 2, 2015, at 3:54 p.m. Both documents are found in the Complaint as **Exhibit 273**.

46. Also on July 2, 2015, the same staff member of the Middlesex County Probate and Family Court who filed the two Notices of Appearance informed Attorney Goodwin that the case file for In Re: Estate of Carol Jane Oulton was missing. Despite repeated efforts by several court personnel, the case file could not be located on July 2, 2015. Court personnel informed Attorney Goodwin that the Notice of Appearance in this matter would be filed, temporarily, with the case file for In Re: Estate of Donald Paul Oulton.

47. Throughout July and August 2015, Attorney Goodwin made a number of calls to the staff of the Middlesex County Probate and Family Court to inquire about the missing case file. In

August 2015 the court personnel informed Attorney Goodwin that the missing case file for In Re: Estate of Carol Jane Oulton had been located in the Accounting Department. Attorney Goodwin reminded the staff that the Notice of Appearance in the In Re: Carol Jane Oulton matter was clipped in the file for In Re: Estate of Donald Paul Oulton, and the staff assured Attorney Goodwin that everything was in order.

48. On July 8, 2015, Attorney Goodwin sent, via FedEx, a letter to Attorney Michael Couture (Exhibit 276 of the Complaint) requesting that Attorney Couture produce evidence pertaining to the Estate of Carol Jane Oulton. As an enclosure with that letter, Attorney Goodwin transmitted to Attorney Couture a copy of her Notices of Appearance in both Probate Court cases (In Re: Estate of Carol Jane Oulton and In Re: Estate of Donald Paul Oulton) (Exhibit 3)

49. On August 5, 2015, Morrison Mahoney LLP, responded to Attorney Goodwin's letter seeking documentation related to the Estate of Carol) on behalf of Attorney M. Couture and Winston Law Group (Exhibit 284 of the Complaint). The response stated, *inter alia*, that:

[t]his office represents Attorney Couture and the Winston Law Group. Please send any correspondence addressed to Attorney Couture or the Winston Law Group, concerning the estates of Carol Jane Oulton or Donald P. Oulton to our attention and refrain from responding to them directly.

50. On October 14, 2015, in violation of Mass.R.P.C. 4.2, Attorney Couture sent a letter transmitting the Citation on Petition for Order of Complete Settlement, Inventory, and Account filed in the above-entitled action directly to Plaintiff, rather than to Attorney Goodwin (Exhibit 287 of the Complaint). Notably, Attorney Couture never filed an Inventory or Account for his tenure as SPR, and the First and Final Account filed on June 15, 2015 (which was signed on December 23, 2014) was fraudulent, inaccurate, and incomplete.

51. Plaintiff does not check her Post Office Box on a regular basis and, thus, did not receive Attorney Couture's letter of October 14, 2015, until November 10, 2015. Given that Plaintiff has been

represented by counsel in this matter for almost two years, Plaintiff neither expects to nor should receive direct communications from any attorneys involved in this case at any time.

52. On November 10, 2015, five days past the November 5, 2015, deadline for filing her Objection to the Petition for Order of Complete Settlement, Plaintiff completed the Certified Mail card that was affixed to Attorney Couture's certified letter (Exhibit 5) and the U.S. Postal Service returned that card to Attorney Couture.

53. On March 16, 2015, Plaintiff Sarah A. Oulton filed a Motion to Enlarge the Period of Time Within Which to Object to Petition for Order of Complete Settlement in the Middlesex County Probate and Family Court, and counsel sent a Notice of Hearing (with the Motion) to all interested parties, including Attorney Couture (c/o his legal counsel, who had previously insisted that Attorney Goodwin communicate only through Morrison Mahoney). A hearing date was set for March 31, 2015 before Judge Abber.

**The Middlesex County Court System Served as the Enterprise
Through Which the RICO Defendants Engaged in a Pattern of Racketeering
Between March 17, 2016, and August 18, 2016**

54. On March 31, 2016, a hearing was held in Middlesex County Probate and Family Court before Judge Abber and Plaintiff's Motion to Enlarge the time period for filing her Objection was extended. Quite notably, **neither Attorney Couture, the Personal Representative** of the Estate of Carol, **nor his legal counsel**, who directed that Attorney Goodwin communicate only through them, **appeared**.

55. On April 14, 2016, Plaintiff filed her Statement of Objections to Attorney Couture's Account (**EXHIBIT 2**). As of the present date, the Middlesex County Probate and Family Court staff still has not docketed Plaintiff's Objection.

56. A Pretrial Hearing date in the Objection matter was set for May 25, 2016, before Judge Abber and Notice of Hearing was sent from the Middlesex County Probate and Family Court to

Attorney Goodwin, Attorney Couture, and the other interested parties. Attorney Goodwin attempted to contact Attorney Couture, through his counsel, but counsel was unresponsive to Attorney Goodwin, therefore no Pretrial Conference was held.

57. On May 25, 2016, Plaintiff and Attorney Goodwin attended the Pretrial Conference on Plaintiff's Objection before Judge Abber. Attorney Couture, for the second hearing in a row, failed to appear at a hearing before Judge Abber in the Middlesex County Probate and Family Court case for the Estate of Carol. At that hearing Judge Abber ordered Attorney Goodwin to file a Petition for Removal of Attorney Couture as Personal Representative of the Estate of Carol. Attorney Goodwin informed Judge Abber that COUNT SIXTEEN of the RICO lawsuit is a count for Removal of Attorney Couture as Personal Representative, but Judge Abber insisted that Attorney Goodwin file the Petition in the Middlesex County Probate and Family Court, anyway. Also on May 25, 2016, Judge Abber set a second "First" Pretrial Hearing on Plaintiff's Objection for August 3, 2016, and wrote in his subsequent Order that sanctions against Attorney Couture would be addressed by Judge Abber at a later date.

58. On June 9, 2016, Attorney Goodwin had Plaintiff drive 93 miles from her home to the Middlesex County Probate and Family Court in order to file the Petition for Removal in the Middlesex County Probate and Family Court (EXHIBIT 3), however the Middlesex County Probate and Family Court clerks would not accept the Petition because Attorney Goodwin made handwritten changes to the form.

59. On June 28, 2016, Attorney Goodwin and Plaintiff drove, again, to the Middlesex County Probate and Family Court in order to file the Petition for Removal in the Middlesex County Probate and Family Court (EXHIBIT 4), however the Middlesex County Probate and Family Court clerks would not accept the Petition.

60. On July 21, 2016, Attorney Couture sent to Attorney Goodwin, via FedEx, a "Motion to Strike Objections to First and Final Account" (EXHIBIT 5), however Attorney Goodwin was out of

state on a pre-arranged vacation when the document arrived at her office. Notably, the Motion to Strike attached as exhibits documentation that Attorney Couture never provided to Plaintiff prior, although he could have, given that her counsel had been requesting documentation related to the Estate of Carol since December 2013. Also quite noteworthy is the fact that the Middlesex County Probate and Family Court clerks have not docketed (*see* **EXHIBIT 1**, the Docket Sheet as of August 18, 2016).

61. The most striking feature of the Account filed in the Middlesex County Probate and Family Court by Attorney Couture (signed December 24, 2014) is that Schedule C indicates a “ZERO BALANCE” for the Estate of Carol. However a Century Bank statement attached to Attorney Couture’s Motion to Strike indicates that the Estate had \$13,865.85 as of January 11, 2015, i.e., after Attorney Couture signed his fraudulent Account showing a “ZERO BALANCE” (**EXHIBIT 6**).

62. On July 29, 2016, 5 days prior to the Pretrial Hearing set for August 3, 2016, Attorney Couture sent Attorney Goodwin an email stating:

As you know, we need to discuss your client’s Objections before the pre-trial hearing on Wednesday. Because of our distact [sic] locations I suggest a conference call. I delivered a Motion to Strike Objections to the parties that you should have received by now. Judge Abber may not entertain a motion at a pre-trial conference so **I will mark that up for a separate hearing on August 18 (I will deliver a separate Notice of Hearing, if necessary)**. Regardless of the motion date, my motion I delivered includes verifications that you and your client should find satisfactory. I also understand you filed a petition to remove me as Personal Representative but that is unrelated to our requirement to have a pre-trial meeting and file a pre-trial memo. . . . [emphasis added]

63. On August 2, 2016, Attorney Goodwin, Plaintiff, and Attorney Couture held a conference call to discuss Attorney Couture’s Account and the documentation attached to Attorney Couture’s Motion to Strike. During the telephone call Attorney Couture admitted that he had not filed an Inventory or Account in his capacity as SPR of the Estate of Carol, and he requested permission to file one retroactively. Attorney Goodwin declined, informing Attorney Couture that it was “too late.” Also during the pre-trial conference, the parties agreed to file separate Pretrial Memoranda at the

hearing to be held the following day. Finally, and most notably, Attorney Couture admitted in the telephone conversation that he had not yet filed the Motion to Strike that he FedExed to Attorney Goodwin. Attorney Goodwin and Plaintiff, together, requested that Attorney Couture transmit a copy of the Motion to Strike that he actually filed, along with the Notice of Hearing required under Mass.R.Civ.P. 6(c). Attorney Couture agreed to do so but, actually, did not.

64. On August 3, 2016, Attorney Goodwin, Plaintiff, Attorney Couture, and the Sibling Defendants attended the (second) First Pre-Trial Hearing at Middlesex County Probate and Family Court in Cambridge. The hearing was set for 2:00 p.m. and when the interested parties arrived, Judge Abber's clerk informed them that:

- (1) Judge Abber was not in court that day; and
- (2) the case file for the Estate of Carol was, once again, missing.

The parties were left with no choice but to reschedule the "first" Pretrial Hearing for yet a third date, so they agreed that the Pretrial would be held on August 24, 2016, at 2:00 p.m. Quite notably, Judge Abber's clerk and Attorney Couture orally informed Attorney Goodwin that the motion hearing on Attorney Couture's Motion to Strike was set for August 18, 2016, at 11:00 a.m.

65. Also on August 3, 2016, both Attorney Goodwin and Attorney Couture filed their Pretrial Memoranda with Judge Abber's clerk but the pleadings were never docketed in the Estate of Carol Case (see EXHIBIT 1).

66. Between August 3, 2016, and August 18, 2016, Attorney Goodwin waited to receive from Attorney Couture the actual Motion to Strike that Attorney Couture filed with the Middlesex County Probate and Family Court (anticipating that he would make changes to it following the joint conference call held on August 2, 2016), along with the Notice of Hearing required under Mass.R.Civ.P. 6(c). Attorney Couture did not transmit either a copy of the Motion to Strike that he filed or the Notice of Hearing that he promised (and which was required under the Rule 6(c).

67. On August 18, 2016, despite not receiving the documents that Attorney Couture promised to send before the motion hearing, Plaintiff and Attorney Goodwin traveled to Middlesex County Probate and Family Court to attend the hearing to be held at 11:00 a.m. Upon checking in for the hearing, however, Judge Abber's clerk informed Attorney Goodwin that the hearing on Attorney Couture's Motion to Strike had been held at 8:30 a.m. that day. Attorney Goodwin and Plaintiff were alarmed that a hearing was held at a time earlier than what they were told on August 3, 2016, and that Attorney Couture had failed to comply with Mass.R.Civ.P. 6(c) to give Notice of the hearing time. Attorney Goodwin asked Judge Abber's clerk what the outcome of the hearing was, however, the clerk would not say. Instead, the clerk told Attorney Goodwin that "the file is missing" and she could not provide any information.

68. Attorney Goodwin and Plaintiff made several inquiries among the staff of the Middlesex County Probate and Family Court but none of the clerks would help locate the missing Estate of Carol file, and as of the date of this Motion for Reconsideration, Plaintiff and Attorney Goodwin do not know what the outcome of the hearing was. Attorney Goodwin attempted to file an emergency *ex parte* motion to request a rehearing, but the Middlesex County Probate and Family Court staff told her that she could not file anything in the matter because "the file is missing."

69. Prior to August 18, 2016, Plaintiff has never missed or been late to any hearing in this matter in the 1,123 days since Attorney Couture was appointed fiduciary of the Estate of Carol and despite the fact that Plaintiff lives 93.5 miles away from the Middlesex County Probate and Family Court. Plaintiff and Attorney Goodwin relied on the oral statements made by Attorney Couture and Judge Abber's clerk on August 3, 2016, and they appeared at 11:00 a.m. on August 18, 2016. Plaintiff and Attorney Goodwin missed the hearing of August 18, 2016, only because they were told the wrong hearing time – at yet another point in time when the Estate of Carol file was "missing" – and only because Attorney Couture failed to serve his Motion to Strike in a lawful manner. The clerk's refusal to

inform Attorney Goodwin of the outcome of the hearing held on August 18, 2016, is indefensible.

Attorney Goodwin attempted to file an emergency *ex parte* motion to request a rehearing, but the Middlesex County Probate and Family Court staff told her that she could not file anything in the matter because “the file is missing.”

70. Currently the August 24, 2016, Pretrial Conference is still on the docket, thus, at this point, Plaintiff and Attorney Goodwin are planning to attend with an updated Pretrial Memorandum on for the anticipated trial on the Objection.

CONCLUSION

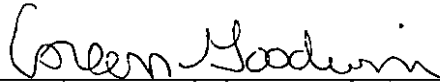
Defendants have brazenly defrauded the Middlesex County Court System (i.e., the Middlesex County Registry of Deeds, the Middlesex County Superior Court, and the Middlesex County Probate and Family Court) as a RICO enterprise in furtherance of their RICO conspiracy and in violation of Plaintiffs’ civil rights. The actions of the Defendants and the staff of the Middlesex County Probate and Family Court have been very detrimental to Plaintiffs. The Middlesex County Court system has, through the actions (and inaction) of the staff of the Middlesex County Probate and Family Court, thwarted Plaintiffs at every turn. Plaintiffs respectfully request, therefore, that this Court reconsider its earlier allowance of the Motion to Transfer filed by the 44 of 66 Defendants. Plaintiffs request that this Court enter judgment in favor of the Plaintiffs on the grounds that new evidence has been discovered between March 17, 2016, and August 18, 2016. Combined with the evidence of the Defendants’ abuse of process, possible collusion with court staff, and their willingness to brazenly defraud the Middlesex County Court system that was previously presented in the Complaint, this new evidence indicates that the Middlesex County Court System serves as a RICO enterprise through which the Defendants engaged in their pattern of racketeering and through which Plaintiffs’ constitutionally guaranteed rights to due process and equal protection of the laws have been violated. The acts of Middlesex County Court personnel described herein, some of which occurred after this Court issued its Order on

Defendants' Motion to Transfer the Case to Middlesex County, shock the conscience or offend the community's sense of fair play and decency. Because transfer of the case to Middlesex County would be grossly prejudicial to Plaintiffs, Plaintiffs respectfully request that the Motion to Transfer filed by the 44 of 66 Defendants be reconsidered and denied.

Dated: August 20, 2016

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON,
SARAH A. OULTON ON BEHALF OF THE ESTATE
OF DONALD PAUL OULTON, and
SARAH A. OULTON ON BEHALF OF THE ESTATE
OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY



Coreen Goodwin
BBO No. 693188
64 Donbray Road
Springfield, MA 01119
Telephone: 413- 241-1004
Email: AttorneyGoodwin@yahoo.com

CERTIFICATE OF SERVICE

I, Coreen Goodwin, do hereby certify that I have this 20th day of August I served the foregoing **PLAINTIFFS' MOTION FOR RECONSIDERATION OF ORDER TO TRANSFER CASE TO MIDDLESEX COUNTY** to all counsel of record and unrepresented parties in this action by shipping the same, via FedEx Standard Overnight Service, to:

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Medway, MA 02053

Andrew Hladick
20 Causeway Street
Medway, MA 02053

Nancy Jane Williams
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David Paul Oulton
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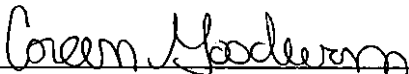
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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #84

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al,
Defendants.

HAMPDEN COUNTY
SUPERIOR COURT
FILED

AUG 24 2016


CLERK OF COURTS

**PLAINTIFFS' EMERGENCY *EX PARTE* MOTION FOR LATE PERMISSION TO FILE
A 30-PAGE LONG MOTION FOR RECONSIDERATION OF ORDER TO TRANSFER
CASE TO MIDDLESEX COUNTY OR, IN THE ALTERNATIVE, FOR PERMISSION
TO FILE AN AMENDED MOTION FOR RECONSIDERATION
NOT EXCEEDING 20 PAGES**

Now come the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton ("Plaintiffs"), and respectfully move this Court for late permission to file a 30-page long Motion for Reconsideration of this court's Order of August 12, 2016, allowing the Motion to Transfer Case to Middlesex County (the "Motion to Transfer") filed by Defendants Colonial Health Group-Westridge, LLC ("Colonial"), Michael Walsh, William Mantzoukas, Richard Kravetz, John Kain, Michael B. Lincoln, Gina M. Queiros, Andrea B. Edwards, Donna DelCid, Karen M. Speroni, Christine A. French, Denise Stephenson, Sauda Matovu, Vinay Kumar, M.D., Athena Health Care Systems MA III LLC ("Athena"), James Bove, Valerie Chakalos-Santilli, Diane Curtis, Kevin Diehl, Michael Mosier, Karen Petrucelli, Laura DosSantos, Lawrence Santilli, Debra M. Soucey, and Thomas Walkuski (together "the Nursing Home Defendants"), John Everett & Sons Funeral Home, Joseph T. Everett, Dennis Cunningham, Susan Davis, Maureen

Reeve, Brian Falvey, Luke Simpson, and Richard Kelly (together “the Funeral Home Defendants”) and assented to by Defendants Michael Couture, Neal Winston, Winston Law Group, LLC, Deborah Masterson, The Law Office of Deborah Masterson, Thomas Moylan, Melissa Curley, Plourde Bogue Moylan & Marino, LLP, Dennis R. Brown, P.C., Dennis R. Brown, and Lisa Vecchio (together, “the 44 of 66 Defendants”) or, in the alternative, for permission to file an amended Motion for Reconsideration not exceeding 20 pages. As grounds for this Motion Plaintiffs state the following:

1. This Court, in its Order of August 12, 2016, allowed the Motion to Transfer Case to Middlesex County filed by the 44 of 66 Defendants (the “Order”). The Order noted that Plaintiff, herself, moved to transfer this matter to Middlesex County on March 17, 2016, and stated “in her motion, supported by affidavit, that the events that gave rise to this action occurred primarily in Middlesex County, that numerous defendants reside or have their principal places of business in that county, that real property that is a subject of this action is in that county, and that there were other related matters then pending in the Middlesex County Probate and Family Court.”

2. On August 17, 2016, Plaintiffs’ counsel received this Court’s Order, and immediately began preparing Plaintiffs’ Motion for Reconsideration of the Order (the “Motion for Reconsideration”) so that it could be served on the Defendants by August 22, 2016.

3. The Motion for Reconsideration in progress stated that it was being filed:

on the grounds that new evidence has been discovered between March 17, 2016, and August 17, 2016. Combined with the evidence of the Defendants’ abuse of process, possible collusion with court staff, and their willingness to brazenly defraud the Middlesex County Court system that was previously presented in the Amended Verified Complaint and Demand for Jury Trial (the “Complaint”), this new evidence indicates that the Middlesex County Court System serves as a RICO enterprise through which the Defendants engaged in their pattern of racketeering and through which Plaintiffs’

constitutionally guaranteed rights to due process and equal protection of the laws have been violated. The acts of Middlesex County Court personnel described herein, some of which occurred after this Court issued its Order, shock the conscience or offend the community's sense of fair play and decency. Because transfer of the case to Middlesex County would be grossly prejudicial to Plaintiffs, Plaintiffs respectfully request that the Motion to Transfer filed by the 44 of 66 Defendants be reconsidered and denied.

4. The Motion for Reconsideration included details of new evidence that Plaintiffs discovered since March 17, 2016 (listed below). These irregularities and improprieties – when taken together – indicate that the Middlesex County Court System served as a RICO enterprise through which the Defendants engaged in the RICO conspiracy that is the subject of this lawsuit.

5. The Motion for Reconsideration in progress as of August 17, 2016, would not have exceeded 20 pages in length, therefore Plaintiffs' counsel did not seek leave of this Court, pursuant to Rule 9A(a)(5) of the Rules of Superior Court, for permission to file a Motion for Reconsideration in excess of 20 pages. Plaintiffs' counsel planned to serve the Motion for Reconsideration that was in progress on August 17, 2016, after returning from a hearing Middlesex County Probate and Family Court ("Middlesex Probate Court") on August 18, 2016 (discussed below).

6. Also on August 17, 2016, Plaintiffs and counsel were preparing to attend a hearing that was purportedly set for the following day, August 18, 2016, at 11:00 a.m. in Middlesex Probate Court. The hearing purportedly set for August 18, 2016, was preceded by the following highly irregular events in the Middlesex County Probate Court case for the Estate of Carol Jane Oulton (the "Estate of Carol"):

a. On **March 31, 2016**, a hearing was held in Middlesex County Probate and Family Court before Judge Abber and Plaintiff's Motion to Enlarge the time period for filing her Objection in the Estate of Carol was extended. Quite notably, **neither Attorney Couture, the Personal Representative of the Estate of Carol, nor his legal counsel, who directed that Attorney Goodwin communicate only through them, appeared.**

b. On **April 14, 2016**, Plaintiff filed her Statement of Objections to Attorney Couture's Account (**EXHIBIT 1**), however **the clerks of the Middlesex County Probate Court refused to file or docket Plaintiffs' Statement of Objections**. As of the present date, the Middlesex County Probate and Family Court staff still has not docketed Plaintiff's Objection.

c. A Pretrial Hearing date in the Objection matter was set for **May 25, 2016**, before Judge Abber and Notice of Hearing was sent from the Middlesex County Probate and Family Court to Attorney Goodwin, Attorney Couture, and the other interested parties. Attorney Goodwin attempted to contact Attorney Couture, through his counsel, but **Attorney Couture's counsel was unresponsive to Attorney Goodwin**, therefore no Pretrial Conference was held.

d. On **May 25, 2016**, Plaintiff and Attorney Goodwin attended the Pretrial Conference on Plaintiff's Objection before Judge Abber. **Attorney Couture, for the second event in a row, failed to appear before Judge Abber in the Middlesex County Probate and Family Court case for the Estate of Carol**. At that hearing Judge Abber ordered Attorney Goodwin to file a Petition for Removal of Attorney Couture as Personal Representative of the Estate of Carol. Attorney Goodwin informed Judge Abber that COUNT SIXTEEN of the RICO lawsuit is a count for Removal of Attorney Couture as Personal Representative, but Judge Abber insisted that Attorney Goodwin file the Petition in the Middlesex County Probate and Family Court, anyway. Also on May 25, 2016, Judge Abber set a second "First" Pretrial Hearing on Plaintiff's Objection for August 3, 2016, and wrote in his subsequent Order that sanctions against Attorney Couture would be addressed by Judge Abber at a later date.

e. During the month of June 2016, Plaintiffs prepared the Petition for Formal Removal of Personal Representative that Judge Abber ordered them to file on May 25, 2016, and served it on all interested parties. Plaintiffs tried numerous times to file the Petition for Formal Removal of Personal Representative in Middlesex Probate Court, but each time they tried to file the document, the Middlesex Probate Court clerks refused to file their Petition. Plaintiffs also attempted to address the clerks' refusal to docket Plaintiffs' Petition for Formal Removal with Middlesex County Probate and Family Court Registrar Tara DeCristofaro, but each time they were told Ms. DeCristofaro "was out of the office," or "was unavailable," or simply could not be located in the court building. As of the present date, Plaintiffs' court-ordered Petition for Formal Removal of Personal Representative has not been filed or docketed.

f. On **July 21, 2016**, Attorney Couture sent to Attorney Goodwin, via FedEx, a draft of his "Motion to Strike Objections to First and Final Account," (which was the subject of the August 18, 2016, hearing) — without the Notice of Hearing required under Mass.R.Civ.P. 6(c) — but **this pleading was neither filed nor docketed until August 19, 2016, one day after Judge Abber allowed it at the hearing held in Plaintiffs' absence on August 18, 2016** (discussed below).

g. On July 29, 2016, five days prior to the Pretrial Hearing set for August 3, 2016,

Attorney Couture sent Attorney Goodwin an email (**EXHIBIT 2**) stating:

As you know, we need to discuss your client's Objections before the Pretrial Hearing on Wednesday [August 3, 2016]. Because of our distact [sic] locations I suggest a conference call. I delivered a Motion to Strike Objections to the parties that you should have received by now. Judge Abber may not entertain a motion at a pre-trial conference so **I will mark that up for a separate hearing on August 18 (I will deliver a separate Notice of Hearing, if necessary)**. Regardless of the motion date, my motion I delivered includes verifications that you and your client should find satisfactory. I also understand you filed a petition to remove me as Personal Representative but that is unrelated to our requirement to have a pre-trial meeting and file a pre-trial memo. . . . [emphasis added]

h. During the Pretrial Conference call held on August 2, 2016,, the parties agreed to file separate Pretrial Memoranda at the hearing to be held the following day. Finally, and most notably, Attorney Couture admitted in the telephone conversation that **he had not yet filed the Motion to Strike** that he FedExed to Attorney Goodwin. **Attorney Goodwin and Plaintiff, together, requested that Attorney Couture transmit a copy of the Motion to Strike that he actually filed, along with the Notice of Hearing required under Mass.R.Civ.P. 6(c). Attorney Couture agreed to do so but Attorney Couture failed to do so.**

i. On **August 3, 2016**, Attorney Goodwin, Plaintiff, Attorney Couture, and the Sibling Defendants attended the (second) First Pre-Trial Hearing at Middlesex County Probate and Family Court in Cambridge. The hearing was set for 2:00 p.m., however, when the interested parties arrived in court Judge Abber's clerk informed them that:

- (1) **Judge Abber was not in court that day** and
- (2) **the case file for the Estate of Carol was, once again, missing.**

The parties were left with no choice but to reschedule the "first" Pretrial Hearing for yet a third date, so they agreed that the Pretrial would be held on August 24, 2016, at 2:00 p.m.. Quite notably, **Judge Abber's clerk and Attorney Couture orally informed Attorney Goodwin that the motion hearing on Attorney Couture's Motion to Strike was set for August 18, 2016, at 11:00 a.m.**

j. Also on **August 3, 2016**, both Attorney Goodwin and Attorney Couture filed their Pretrial Memoranda with Judge Abber's clerk, however, **the Middlesex County Probate Court staff did not file or docket the Pretrial Memoranda**. As of the present date, the Pretrial Memoranda have been neither filed nor docketed.

k. **Between August 3, 2016, and August 18, 2016**, Attorney Goodwin waited to

receive from Attorney Couture the actual Motion to Strike that Attorney Couture filed with the Middlesex County Probate and Family Court (anticipating that he would make changes to it following the joint conference call held on August 2, 2016), and the Notice of Hearing, pursuant to Mass.R.Civ.P. 6(c). **Attorney Couture did not transmit either a copy of the Motion to Strike that he filed or the Notice of Hearing.**

7. On August 18, 2016, despite not receiving the documents that Attorney Couture promised to send before the motion hearing, Plaintiff and Attorney Goodwin traveled to Middlesex County Probate and Family Court to attend the hearing to be held at 11:00 a.m. Upon checking in for the hearing, however, Judge Abber's clerk informed Attorney Goodwin that **the hearing on Attorney Couture's unfiled and undocketed Motion to Strike had been held at 8:30 a.m. that day.**

8. Attorney Goodwin immediately asked Judge Abber's clerk what the outcome of the hearing was, however, **Judge Abber's clerk would give any information about the hearing to Attorney Goodwin. Instead, the clerk told Attorney Goodwin that "the file is missing".**

9. Next, Attorney Goodwin and Plaintiff made several inquiries among the staff of the Middlesex County Probate and Family Court but **none of the clerks would help locate the missing Estate of Carol file.**

10. While still at the Middlesex Probate Court on August 18, 2016, Attorney Goodwin attempted to file an emergency *ex parte* motion to request a rehearing, but **the Middlesex County Probate and Family Court refused to file Attorney Goodwin's pleading, and told her that she could not file anything in the matter because "the file is missing."**

11. Also, while still in the Middlesex Probate Court on August 18, 2016, Attorney Goodwin asked the Probate Court staff for a printed copy of the Docket Sheet (**EXHIBIT 3**). The Docket Sheet of August 18, 2016, indicates that **Attorney Couture's Motion to Strike was**

neither filed nor docketed on August 18, 2016.

12. Prior to August 18, 2016, Plaintiff had never missed or been late to any hearing in this matter in the 1,123 days since Attorney Couture was fraudulently appointed fiduciary of the Estate of Carol, despite the fact that Plaintiff lives 93.5 miles away from the Middlesex County Probate and Family Court.

13. Plaintiff and Attorney Goodwin missed the hearing of August 18, 2016, because Attorney Couture failed to serve his Motion to Strike in accordance with Mass.R.Civ.P.6(c).

14. The unprecedented and unlawful events of August 18, 2016, in the Middlesex Probate Court resulted in the need for Plaintiffs' counsel to immediately alter and enlarge the Motion for Reconsideration that they had been preparing as of August 17, 2016. Only by describing in detail Defendants' prior numerous abuses of the Middlesex County Court System, in furtherance of the RICO conspiracy at the heart of this lawsuit, and only by including the details of the unconstitutional hearing held on August 18, 2016, could Plaintiffs' counsel zealously argue the Motion for Reconsideration.

15. Plaintiffs drove a 180-mile round trip on Thursday, August 18, 2016, and counsel immediately went to work revising their Motion for Reconsideration and preparing FedEx packaging so that the 66 Defendants would receive the Motion for Reconsideration on August 22, 2016.

16. Given that the Hampden County Superior Court was closed on Saturday, August 20, 2016, Plaintiffs' counsel had no time to seek leave of this court for permission to file a Motion for Reconsideration in excess of 20 pages while still meeting the FedEx deadline of Saturday, August 20, 2016, so that the 66 Defendants would receive the Motion for Reconsideration on August 22, 2016.

17. The Middlesex Probate Court Docket Sheet as of August 22, 2016, is attached hereto as **EXHIBIT 4**. Quite noteworthy is the fact that **the Middlesex County Probate and Family Court clerks did not docket the Motion to Strike until August 19, 2016, one day AFTER the hearing in the matter was held without a Notice of Hearing being provided to Plaintiffs.**

18. Given that Plaintiffs received the Order on August 17, 2016, and were most recently denied their due process rights by the Middlesex County Court System on August 18, 2016, there was no possible opportunity for Plaintiffs to seek leave of court for permission to file a Motion for Reconsideration that exceeded 20 pages.

19. Combined with the evidence of the Defendants' long history of abuse of process, possible collusion with Middlesex County court staff, and the Defendants' willingness to brazenly defraud the Middlesex County Court system (i.e., the evidence that was previously presented in the Amended Verified Complaint and Demand for Jury Trial [the "Complaint"]), the new evidence discovered between March 17, 2016, and August 18, 2016, clearly indicates that the Middlesex County Court System serves as a RICO enterprise through which the Defendants engaged in their pattern of racketeering and through which Plaintiffs' constitutionally guaranteed rights to due process and equal protection of the laws have been systematically violated.

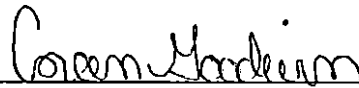
20. Plaintiffs believe that the Motion for Reconsideration required 30 pages so that as many facts related to the Defendants' misuse of the Middlesex County Court System as a RICO enterprise through which the Defendants perpetrated (and continue to perpetrate) the RICO conspiracy at the heart of this lawsuit could be explained to this Court.

WHEREFORE, Plaintiffs respectfully request that this Court grant Plaintiffs late permission to file a 30-page long Motion for Reconsideration of this court's Order of August 12, 2016, or, in the alternative, permission to file an Amended Motion for Reconsideration not exceeding 20 pages in length.

Dated: August 24, 2016.

Respectfully submitted,

PLAINTIFFS SARAH A. OULTON,
SARAH A. OULTON ON BEHALF OF THE
ESTATE OF DONALD PAUL OULTON, and
SARAH A. OULTON ON BEHALF OF THE
ESTATE OF CAROL JANE OULTON
BY AND THROUGH HER THEIR ATTORNEY



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**HAMPDEN COUNTY
SUPERIOR COURT**

UNOFFICIAL RECORD #85

COMMONWEALTH OF MASSACHUSETTS
THE SUPERIOR COURT

HAMPDEN, ss.

DOCKET NO. 1579CV00917

Sarah A. Oulton, et al.,
Plaintiffs,

v.

Carol B. Hladick, et al.,
Defendants.

ORDER OF NOTICE BY PUBLICATION

This cause, which was pending in Hampden County Superior Court but transferred to Middlesex Superior Court on August 12, 2016, by Judge John S. Ferrara, came to be heard upon the motion of the Plaintiffs, praying for an order of publication.

It is ordered, and adjudged that an order of notice issue to said Defendant, James Bove, whose last known address was 2100 Dorchester Ave., Dorchester, MA 02122, by publishing an attested copy of this order once each week for three consecutive weeks in the *Boston Herald*, a newspaper published in the City of Boston, at least 21 days before November 1, 2016, and that said Defendant, James Bove, do cause his written appearance to be entered in ~~Webster~~ ^{Woburn} in Middlesex County on or before November 1, 2016. If you, James Bove, fail to do so, judgment by default will be taken against you.

Unless otherwise provided by Rule 13(a), your answers must state as a counterclaim any claim which you have against the Plaintiffs, Sarah A. Oulton, Sarah A. Oulton on behalf of the Estate of Donald Paul Oulton, and Sarah A. Oulton on behalf of the Estate of Carol Jane Oulton, which arises out of the transaction or occurrence that is the subject matter of the Plaintiffs' claims against you, or you will, thereafter, be barred from making such claim in any other action.

Dated this 31st day of August, 2016.

By the Court (Ferrara, J.)



Laura S. Gentile, Esquire
Clerk of Courts