

\* Amended Motion for Certificate of Service  
Inclusion

COMMONWEALTH OF MASSACHUSETTS  
SUPREME JUDICIAL COURT

Ruth Adjarthey, Ismail Abdelhamed, Vesta	)	
Ballou, Mildred Collins, Jackeline	)	
Cucufate, Marjorie Evans, Matthew	)	
Griffin, Gerard Hughes, Donna Mejias-	)	
Berrios, Janet Montgomery, Elizabeth	)	
Norris, Luciano Oliveira, Mychelyne	)	Docket No. SJC-12380
Oliveira, Susan Osborne, Daniel	)	
Peristere, Christy Raymond, Caitlin	)	
Ryals, John Schumacher, Myron Swanston	)	
Petitioner-Appellants	)	
v.	)	
	)	
Worcester Housing Court,	)	
Original Respondent-Appellee,	)	
Santander Bank, Midfirst Bank,	)	
Nationstar Mortgage LLC, MRH Sub1 LLC,	)	
Freddie Mac, Fannie Mae, U.S. Bank N.A.	)	
As Trustee Of J.P. Morgan Acquisition	)	
Trust 2006-WMC3, Lisa Y. Barron, HSBC	)	
Bank USA N.A. As Trustee For Nomura	)	
Asset Acceptance Corporation Mortgage	)	
Pass Through Certificates Series	)	
2005-AR3, HSBC Bank USA N.A. As Trustee	)	
On Behalf Of Fremont Home Loan Trust	)	
2006-C Mortgage-Backed Certificates	)	
Series 2006-C, Savers Co-Operative Bank,	)	
Deutsche Bank National Trust Co. Trustee	)	
For Ameriquest Mortgage Securities Inc.	)	
Asset-Backed Pass Through Certificates	)	
Series 2003-13, US Bank N.A. As Trustee	)	
For Bear Stearns Asset Backed Securities	)	
Trust 2004-Ac4, U.S. Bank Trust N.A.	)	
Trustee Of Volt 2012-NP11 Asset Holdings	)	
Trust	)	
Respondents-Appellees	)	
	)	

Christine Hilton, Ruth Adjarthey, Ismail	)	
Abdelhamed, Vesta Ballou, Lori Cairns,	)	
Jackeline Cucufate, Marjorie Evans,	)	
Gerard Hughes, Maria Navedo, Paul Norris	)	
John Schumacher, Jean Atkinson, Edna	)	
Austell, Annette Bent, Steven Bourassa,	)	
Samantha Farrar, Patricia Ferreira	)	
Bonilla, Kelly Johnson, Felix Kangaru,	)	
Heather Kozac, Cheryl Leblanc, Philippe	)	
Leblanc, William Marks, Deb McCarthy,	)	Docket # SJC-12406
Keith McKenzie, Paulette McKenzie,	)	
Miranda Morgan, Joseph Nuzzolilo,	)	
Cynthia O'Gara, Mychelyne Oliveira,	)	
Susan Osborne, Thomas Saxe, Al Solitro,	)	
Sherry Stanley, Myron Swanston, Stefani	)	
Tubert, Tracey Tobin, Cynthia White,	)	
Nunciata Sullivan, Lila Ortiz, Carl	)	
Rellstab, Carey Souda, Patricia O'Dell,	)	
Linda Potter, Brian Potter, Jasmine	)	
Alvarez,	)	
Petitioner/Intervenor-Appellants	)	
vs.	)	
	)	
Worcester Housing Court,	)	
Defendant-Appellee,	)	
	)	

Petitioners' Reconsideration of SJC Decision of April 10, 2019  
in Regards To SJC

NOW COMES Petitioner Annette Bent and requests the SJC reconsider its Decision because since its laying down of these rulings Bent has time after time, motion upon motion, through numerous reconsiderations and single justice appeals, tried exhaustively to invoke the SJC rulings to no avail.

The Worcester Housing Court, though given specific direction, chooses to turn its back to the poor and to the Supreme Judicial Court, its Superior, through continuing to ignore our protections of those not only laid down by the Supreme Judicial Court, but of those under our Constitution.

All lower courts including the single justices, have refused to acknowledge the SJC rulings. Here, the specific example of disregard of this very pair of SJC decisions, (still hot off the presses), should serve as a warning and call for revision of this set of decisions by this Honorable Court.

Clearly, What the SJC says, matters not.

Our Constitutional rights to remedy and relief seem to be inconsequential.

#### STATEMENT OF RELEVANT FACTS

- On 12/16/16, #16H85SP4973 first case commenced.  
Surcharge 185C: Entry of Action filed(Section 466-MGL c. 185C, s 19), Summary Process: MGL Chapter 185C s 19; Chapter 262 s 2, Notice to quit filed.
- On 2/06/17, First Justice Diana H. Horan did find for Bent.  
*"The defendants challenged the certified documents submitted in to evidence by plaintiff's counsel. The defendants also argued that the plaintiff Trust is not authorized to do business in Massachusetts and therefore can not bring this eviction action. Plaintiff's counsel was given 7 days to submit a written response to this claim. No response having been submitted, this matter is hereby dismissed without prejudice."*
- On 2/07/17 above entitled matter was dismissed for the following reason(s) \*Judgement of Dismissal.

- On 8/28/2017, Plaintiff, U.S. ROF III, the foreclosing entity attempted to legally commence this second Summary Process Case #17H85SP003455 against Defendant. As part of filing, it requested transfer of documents from the first Summary Process case to be added to commence this case (See violation of Summary Process Rule 2 below and Adjartey v. Worcester Housing Court).

The transferred documents included the purported foreclosure deed with affidavit of sale, and the certificate of entry.

- On 5/02/2017, the Hilton v. Worcester Housing Court case entered.
- On 6/23/2018, Bent joined the Hilton v. Worcester Housing Court Case because her docket shows the insertion of additional documents to the Summons and Complaint. As explained in Bent's intervenor brief, this is in explicit contravention of Summary Process Rule 2.
- On 12/06/2018, the Honorable Supreme Judicial Court combined the Adjartey and Hilton cases (SJC-12408) for the purpose of argument.
- On 1/28/2019, The Worcester Housing Court acknowledged Bent's indigency in the Motion to Set Appeal Bond; but ordered an Appeals Bond and Use and Occupancy that was a bar given that it would require Bent and her family to forgo the necessities of life to prosecute her Appeal.
- Further, as the Worcester Housing Court had held in the previous dismissal, Plaintiff had to produce

evidence of being registered foreign entity in Mass Secretary of State's office. Such evidence was never and still has never been produced. Bent clearly qualified as having a non-frivolous appeal. One test is if any judge has ever agreed with your argument - here the Judge had in the just previous case<sup>1</sup>.

- On April 10, 2019 the SJC posted its unpublished decision in case no. SJC-12380 RUTH ADJARTY & others v. CENTRAL DIVISION OF THE HOUSING COURT DEPARTMENT & others, combining its decision by reference with SJC-12408 CHRISTINE HILTON & others v. CENTRAL DIVISION OF THE HOUSING COURT DEPARTMENT of which Bent is apart, stated on Page 18, section 2, "Waiver of fees and costs based on indigence":

"The Indigent Court Law exists to 'ensure that the doors of the Commonwealth's courts will not be closed to the poor.' Reade, supra. The equitable and consistent application of this law is therefore critically important to safeguarding every Massachusetts litigant's ability to 'obtain right and justice freely, and without being obliged to purchase it'"

- On 3/1/2019, stated by Judge Milkey of the Appeals Court- Memorandum in Support of Waiver of Appeal Bond

---

<sup>1</sup> "That trial courts have come to different conclusions about the meaning of the language - we have been directed to no appellate cases - means that Camillo's position is not a frivolous one, it may turn out to be wrong in the end, but, at the moment, she has creditable judicial allies. The issue of law involved has not yet been settle and Camillo's defense is not beyond a prayer of a chance.

The determination that a defense is frivolous requires more than the judge's conclusion that the defense is not a winner and that the party claiming it is wrong as matter of law, Frivolousness imports futility - not "a prayer of a chance." *Pires v. Commonwealth*, 373 Mass. 829, 838, 370 N.E.3d 1365 (1977), *Tamber v. Desrochers*, 45 Mass.App.Ct. 234, 696 N.E.2d 969 (1998).

Once again, *Camillo may turn out not to be right in the end, but her position is not at all futile*. As Camillo has a defense to the correctness of the foreclosure that is not frivolous, *she is entitled to walver* of an appeal bond under G.L. c. 239 S5" [emphasis added] *Home Sav. Bank of America, FSB v. Camillo*, 697 N.E.2d 134, 45 Mass.App.Ct. 910 (1998).

and Use and Occupancy, #9 "The Judge (Salvidio) appears to have assumed that this deprived her of jurisdiction to consider a waiver of the appeal bond, no matter how indigent the defendants may be, and no matter how meritorious their appellate issues may be."

The Worcester Housing Court had "closed its doors to the poor".

In its April 10<sup>th</sup> decision, the SJC affirmed the Summary Process Rule 2 exclusions allowing only (i) the Court Promulgated Summons and Complaint (FOOTNOTE 5):

"A sample summary process summons and complaint form is available at <https://www.mass.gov/files/documents/2016/08/pe/summary-process-complaint-rev.pdf> [<https://perma.cc/23R5-N9T4>]. A landlord seeking to evict a tenant must obtain this form from the clerk's office. See Rule 2(a) of the Uniform Summary Process Rules (1993)."

(ii) the Notice to Quit and Proof of Service (FOOTNOTE 6):

"In order to initiate a summary process action, the landlord must file the original summons and complaint, return of service confirming the tenant's receipt of the summons and complaint, and a copy of the notice to quit. Rule 2(d) of the Uniform Rules of Summary Process (1993). Depending on the jurisdiction, the landlord may also be required to file a copy of a certificate of eviction granted by a rent control agency (or an affidavit of exemption) or a copy of an affidavit verifying compliance with local laws governing condominium conversion evictions. Id. The landlord must also pay an entry fee, unless that fee has been waived. Id."

(iii) the only reason allowed to be that stated in the Notice to Quit:

"The basis for the landlord's eviction action is limited to the reasons for eviction provided in the notice to quit. *Strychaski v. Spillane*, 320 Mass. 382, 384-385 (1946).

Finally, the SJC confirmed according Summary Process Rule 2, that when anything beyond ("other than") the reason and basis of the Notice to Quit is included, then a "landlord" such as Plaintiff can only evict under a new summary process case unless defendant(s) agree to move:

"Where a landlord seeks to evict the defendant for reasons other than those provided in the notice to quit, the landlord must "recommence the summary process procedure and issue a new notice to quit" explaining the new grounds for eviction, and then file a new summary process summons and complaint if the tenant chooses not to vacate the premises. Federal Nat'l Mtge. Ass'n v. Nunez, 460 Mass. 511, 520 n.11 (2011), citing Strycharski, supra."

- On 4/8/2019, two days before SJC decision in Hilton v. Worcester Housing Court was first promulgated for public view, the Worcester Housing Court allowed Defendant's Appeal to Dismiss for nonpayment of extra fees that Bent could not afford without forgoing the necessities of life.
- On 4/18/19, Defendant filed Motion for Reconsideration and to Vacate Order of 4/08/19; to Require Recommencement Per Adjartey Decision.
- On 4/18/19 Judge Horan denied Defendants motion without a hearing stating "Defendants appeal was dismissed for failure to comply with 239 s. 5 and 6 as ordered by this Court and confirmed by SJ Milkey. The issue of the appeal bond and use and occupancy payment due was not affected by SJC-12380 issued April 10, 2019".
- On 4/19/19 above Denial docketed. The Worcester Housing Court has admitted to Bent's facts.

- On 4/30/19 Motion for Stay under M.R.A.P 6(a) filed. Denied SJ Blake.
- On 4/30/19 Notice of Appeal or Referral of Question to Full Panel and Stay of Eviction Pending Docketing of Same.
- On 5/01/19 Eviction Scheduled for 10:00 A.M.
- On 5/01/19 Chapter 7 Bankruptcy filed Case No. 19-40711
- On 5/03/19 Motion For Relief From Automatic Stay entered by Plaintiff

In the Preliminary Injunction request transferred by the Supreme Judicial Court to the Single Justice of Suffolk County, placing the facts as to the documents inserted into Bent's Summary Process file again under Mass Rules of Civil Procedure, the Worcester Housing Court did, in that one instance, timely file its opposition to the request for the preliminary injunction. (see attached Exhibit C)

Based on the acceptance of hundreds of ex parte filings, the Worcester Housing Court acknowledged regular acceptance of some documents without service on "post-foreclosure" defendants, without notice itself to defendants, having relied upon those documents in its deliberations, with no explanation of its acts in violation of Summary Process rule 2. (see attached D)

It, therefore, had an explicit opportunity to refute the facts laid out in the brief. It did summarize the claims but specially did not deny any of the fact basis provided.

As this was their only responsive pleading to the intervenor's factual basis for intervening and requesting the



preliminary injunction and submitting the intervenor brief appendices showing the fact of what is being done, therefore the Worcester Housing Court has accepted those facts. So, Bent believes, should this Court.

The court is reminded that those facts include the repetitive litany in each of the cases of the inaccuracy, untruthfulness, inadmissibility of the documents that are secreted into the files from the registries of deeds. As argued by Bent as Petitioner/Intervenor in Oral Argument in front of the SJC on 12/06/18, included here her written explanation of these from her own filings and the legal basis for the interpretation. (see attached Exhibit E pages 29-32)

The court is reminded that a suite of documents recorded together at the Registry of Deeds are available for judicial review and for review of the legal veracity of the documents based on comparison between the documents.

Bent laid out that comparison for the SJC but it also existed in the pleadings and the Respondent chose to acknowledge the existence of all of those facts but also consciously chose not to deny them either in a blanket denial under Mass Civil Rules of Procedure 8 nor point by point denial<sup>2</sup>. Therefore again,

---

<sup>2</sup> MRCP Rule 8 Reporters notes specifically identify the meaning of rule 8b "behind rule 8b lies the simple principal that a defendant's answer should unmistakably indicate to both court and plaintiff precisely which aspects of the complaint are admitted and which are controverted...only three responses are proper an admission of those allegations a denial of allegations or a disclaimer of knowledge or information sufficient to form a belief" and goes on to say "rule 8b thus proscribes promiscuous use of the general denial except in those rare cases where defendant and more importantly his attorney in good faith denies each and every allegation in the complaint"

This perspective differs from Mass General Laws ch. 231 section 22 which permitted the general issue in real and mixed action however, 231 section 25 required a separate denial in clear and precise terms of each substantive fact intended to be denied or a declaration of ignorance.

We need to remind the SJC that all those things were admitted and skip the stone across the water on the most damaging of them to the WHC and ask why the court has not stepped in.

the Worcester Housing Court has allowed them to be entered into the record undisputed.

These facts became undisputed under MRCP Rule 8. And as stated in the Reporter's Notes, "*The purpose of the change (2016) was to acknowledge that both the court and the parties have the obligation to employ the rules for the purposes set forth.*"

The undisputed factual layout showing these documents are factually untrue and by definition not affidavits based on true personal knowledge means that the very documents entered supposed to prove the standing of the trial court plaintiffs in these cases such as Plaintiff U.S. ROF III in Bent's Summary Process case, has been acknowledged as untrue as to a valid foreclosure by the Worcester Housing Court and thereby acknowledged that none of the Summary Process cases including the Plaintiff U.S. ROF III against Bent had standing.

This Honorable Court is no doubt well aware that according to Mass Civil Rules of Procedure Rule 1, the single justice cases such as a Writ of Mandamus Petition is covered by Mass Civil Rules of Procedure (brought under MGL Chapter 211 section 3 as the only statute remaining for a Writ of Mandamus against a court). No doubt the Worcester Housing Court's counsel as the Assistant Attorney General for our state was also well aware of that fact. If pro se litigants are expected to abide by the MRCP and MRAP even without law degrees or legal counsel, surely the Worcester Housing Court and its Counsel are expected to know the rules and be bound by them (as apparently are all the Courts explicitly as of 2016)

## STANDARD OF REVIEW

Petitioner timely (given request for enlargement) requests modification of this Honorable Court's decisions of April 10, 2019 in Adjartey v. Worcester Housing Court and Hilton v. Worcester Housing Court under applicable rule:

**"Appellate Procedure Rule 27: Motion for reconsideration or modification of decision**

Within 14 days after the date of the decision of the appellate court, any party to an appeal may file a motion for reconsideration or modification of decision unless the time is shortened or enlarged by order. It shall state with particularity the points of law or fact which it is contended the court has overlooked or misapprehended and shall contain such argument in support of the motion as the movant desires to present."

## ARGUMENT

Most basically, it appears that the new SJC decision of April 10, 2019, to which Bent is a party directly reverses aspects of the Summary Process case, against her.

First, it affirms that the insertion of documents beyond those allowed by Summary Process Rule 2 attempted to establish a basis beyond the allowed wording on the Summons and Complaint from the Notice to Quit. Plaintiff, if it wishes to evict, must recommence its case.

The Court is reminded that the Hatcher decision clarified and affirmed existing jurisprudence that only what is explicitly authorized under Summary Process statute is allowed in Summary Process:

"see also Cummings v. Wajda, 325 Mass. 242, 243, 90N.E.2d337 (1950) \*\*326 ("Summary process is a purely statutory procedure and can be maintained only in the instances specifically provided for in the statute")."

Second, the SJC has affirmed the controlling nature of the Court Indigency Statutes and the interpretation under Reade v. Galvin of the Constitutional nature of compliance by the Courts with these statutes.

While fee waivers such as those for audio recordings and for appeal bond and Use and Occupancy are considered "extra fees", the SJC has repeated they are not to be used to bar the ability of an indigent litigant to enter the doors of the Court and prosecute a defense.

Clearly, Bent has been so financially barred.

Given that the Plaintiff had no right to prosecute this case having violated the Summary Process requirements under Rule 2 by inserting ex parte documents, and improperly attempted to go forward barring Bent from Appeal of a case the SJC has just affirmed, could never have legally commenced, denies her right to appellate review. A violation of the commencement of this case where the SJC has just affirmed that such a review, should yield that judgment, in this case is void.

Just because Bent's complaint as to the insertion of unallowed documents was not yet recognized, the meritorious nature of that challenge to the judgment in this case has now been clarified in the 4/10/2019 SJC decision in the Adjartey case and its companion case Hilton to which Bent was a party.

The undisputed nature of almost all of the extensive facts provided in both petitions and the intervenor brief were undisputed. (see attached Exhibit F, that the foreclosure was void)

It should be well noted that the Worcester Housing Court did no where answer nor defend against the claims of disparate treatment, threats, consideration of affiliation, denial of access on the basis of indigency and/or disability, nor lack of the constitutional right to a "full hearing" on the basis of being pro se. Those are presumably waived under the rules.

While Petitioners' research found that a formal Writ of Mandamus went out of service under Massachusetts Law in the 1970s (1973), the promise of such redress was not expunged. Its purpose is preserved under Mass Rules of Civil Procedure Rule 81:

**"(b) Writs abolished**

The following writs are abolished: audita querela; certiorari; entry; error; mandamus; prohibition; quo warranto; review; and scire facias. In any action seeking relief formerly obtainable under any such writ, procedure shall follow these rules.

**Reporter's notes**

(1973) ...Rule 81(b) abolishes a series of venerable, and in many instances, arcane, writs. Burial of these antiques, however, does not mean elimination of the relief they afforded. It does mean that an application for such relief will henceforth be commenced like any other civil action under these rules, viz., by complaint and summons, with the former containing a prayer for the appropriate relief."

Given that these petitioners were repeatedly explained by Petitioners as requests for relief under a Writ of Mandamus against the Worcester Housing Court, the legislative history and Mass Rules of Civil Procedure make it clear that Mass Rules of Civil Procedure<sup>3</sup> control

---

<sup>3</sup> Mass Rules of Civil Procedure commence with:  
"Rule 1: Scope of rules

**"Civil Procedure Rule 8: General rules of pleading**

**(b) Defenses: Form of denials**

A party shall state in short and plain terms his defenses to such claim asserted and shall admit or deny the averments upon which the adverse party relies. If he is without knowledge or information sufficient to form a belief as to the truth of an averment, he shall so state and this has the effect of a denial. Denials shall fairly meet the substance of the averments denied. When a pleader intends in good faith to deny only a part or a qualification of an averment, he shall specify so much of it as is true and material and shall deny only the remainder. Unless the pleader intends in good faith to controvert all the averments of the preceding pleading, he may make his denials as specific denials of designated averments or paragraphs, or he may generally deny all the averments except such designated averments or paragraphs as he expressly admits; but, when he does so intend to controvert all its averments, he may do so by general denial subject to the obligations set forth in Rule 11.

**(d) Effect of failure to deny**

Averments in a pleading to which a responsive pleading is required, other than those as to the amount of damage, are admitted when not denied in the responsive pleading."

---

These rules govern the procedure before a single justice of the Supreme Judicial Court or of the Appeals Court, and in the following departments of the Trial Court: the Superior Court, the Housing Court the Probate and Family Court in proceedings seeking equitable relief, the Juvenile Court in proceedings seeking equitable relief, in the Land Court, in the District Court and in the Boston Municipal Court, in all suits of a civil nature whether cognizable as cases at law or in equity, with the exceptions stated in Rule 81. They should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding. ...

**Reporter's notes**

(2016) The amendment to Rule 1, adopted from the Federal Rules of Civil Procedure, changed the second sentence of the first paragraph so that it reads: "They [the Massachusetts Rules of Civil Procedure] should be construed, administered, and employed by the court and the parties to secure the just, speedy, and inexpensive determination of every action and proceeding.

*The purpose of the change was to acknowledge that both the court and the parties have the obligation to employ the rules for the purposes set forth."* [emphasis added]

It is important to note that under the rules, the finder of fact does not have to decide that undenied facts are then admitted:

"Reporter's notes ...Rule 8(d) sets up a straightforward way of dealing with failure to deny averments:

(1) If the averments are contained in a pleading to which a responsive pleading is authorized, the pleader must either utilize the opportunity or be taken to have waived it. Rule 8(d) makes the admission automatic."

The Defendant Bent submits that the Worcester Housing Court in its argument on December 6<sup>th</sup>, argued against the Petitioners' right to ask for the redress but the Worcester Housing Court did not however, refute any of the facts that the Petitioner laid before the SJC.

The Worcester Housing Court specifically did not exercise its right under MRCP Rule 8 in answering in its responsive pleading. It did not go point by point and affirm or deny the facts. It has denied a few facts out of the hundreds of facts submitted and did not provide a blanket denial thereby agreeing to the truth of those remaining facts. Therefore, all of Bent's facts that the Foreclosure Deed and the attached Affidavit when compared with the other Registry filings showed a void foreclosure, are thereby before the court to be accepted as undisputed.

Specifically, Petitioners to the *Adjartey* and *Hilton* cases waited for any sort of 22c letter to be submitted to the SJC by the Respondent's attorney. No such letter has been forthcoming in the four months that have passed.

## CONCLUSION

For the above reasons, Bent requests this Honorable Court to compel Worcester Housing Court and Single Justices to acknowledge, apply and enforce this most Honorable Courts Rulings<sup>4</sup>. We implore you, without Your enforcement of these rulings we do not stand a prayer of a chance of receiving true Justice.

Respectfully submitted,



Annette S. Bent,  
Appellant/Defendant  
6 Rose Lane  
Oxford, MA 01540

---

<sup>4</sup>BONY MELLON v. Dundon Docket No.18H85SP005723  
Worcester Housing Court though not applying the SJC decisions for the pro se litigants; have allowed opposing attorneys to misrepresent the SJC rulings in their favor: "Similarly, Massachusetts Rule of Civil Procedure 60(b) "does not provide an avenue for challenging supposed legal errors and... subsection (6) relief is to be granted only in extraordinary circumstances." Bromfield v. Commonwealth, 400 Mass. 254, 257 (1987). Rule 60(b) does not provide for "general reconsideration of an order" or a challenge to "alleged legal errors" because those issues are suitably dealt with on appeal. See Amerada Hess Corp. v. Garabedian, 416 Mass. 149, 156(1993); Jones v. Boykan, 464 Mass. 285, 291 (2013) ("Rule 60 is not a substitute for the normal appellate process"). Furthermore, the Supreme Judicial Court recently reaffirmed that, "courts have 'required strict adherence to the short period for claiming an appeal prescribed by G.L. c.239,s5' ". Adjarty v. Central Division of the Housing Court Department, 481 Mass. 830, ---, 120 N.E.3d 297, 322(2019) (internal citations omitted.) D

Date: 5/06/19



**CERTIFICATE OF SERVICE**

I, the below signed, hereby certify that a true and correct copy of the above and foregoing has been furnished to all opposing parties by pre-paid First Class Mail, U.S.P.S.

Worcester Housing Court's Attorney

Maryanne Reynolds

Assistant Attorney General

Government Bureau

Office of the Attorney General

10 Mechanic St., Suite 301

Worcester, MA 01608

774-214-4407

508-795-1991 (fax)

[Maryanne.reynolds@state.ma.us](mailto:Maryanne.reynolds@state.ma.us)

Re: Docket# 16H85SP001387, Barron, Lisa Y. v. Montgomery

Henry Raphaelson, Esq.

Raphaelson & Raphaelson

430 Main St.

Worcester, MA 01608

Re: Docket #16H85SP004125, MRII Sub I, LLC v. Cucufate

Tracey A Kish, Esq.

Korde & Associates

900 Chelmsford St. Suite 3102

Lowell, MA 01851

Re: Docket#14H85SP000710, U.S. Bank National Association Trustee  
of J.P. Morgan Mortgage Acquisition Trust v. Berrios

Adam M. Hamel, Esq.

Andrew Hamilton, Esq.

Shiva Karimi, Esq.

McLane Middleton Professional Association

300 Trade Center Suite 7000

Woburn, MA 01801

Re: Docket#16H85SP000150, Nationstar Mortgage, LLC v. Ballou

Neil W. Heiger, Esq.

Shechtman Halperin Savage, LLP

1080 Main St.

Pawtucket, RI 02860

Re: Docket #16H85SP002533, HSBC Bank, USA, National Association  
v. Oliveira, et al

Andrew B. Delory, Esq.

Law Office of Paul A. Delory

365 Broadway

Everett, MA 02149

Re: Docket #16H85SP000940, Savers Co-operative Bank D/B/A Savers Bank v. Peristere

Howard B. D'Amico, Esq.

Howard B. D'Amico, P.C.

33 Waldo St.

Worcester, MA 01608

RE: Docket #16H85CV000234, Norris, Elizabeth v. HSBC Bank USA, National Association as Trustee

Re: Docket #10H85SP001207, U.S. Bank, N.A. as Trustee v. Schumacher

K & L Gates, LLP

Michael Robert Murphy, Esq.

Morgan T. Nickerson, Esq.

State Street Financial Center

One Lincoln Street

Boston, MA 02111-2950

Re: Docket #15H85SP004099, Federal Home Loan Corporation v. Evans Patrick Beaton

Doonan, Graves & Longoria

100 Cummings Center, Suite 225D

Beverly, MA 01915

Re: Docket #16H85SP002415, Fannie Mae A/K/A Federal National Mortgage Association v. Hughes

William Lawson

McCarter & English  
265 Franklin Street  
Boston, MA 02110

Re: Docket #15H85SP003985, Santander Bank, N.A. v. Adjarthey,  
Re: Docket #16H85SP001313 MidFirst Bank v. Abdelhamed,  
Re: Docket #16H85SP004400 MidFirst Bank v. Raymond,  
Re: Docket #15H85SP003287, #15H85SP003288, #16H85SP003289,  
U.S. Bank Trust, N.A. Trustee of VOLT 2012-NPL1 Asset Holdings  
Trust v. Swanston,

Re: Docket # 14H85SP000755 Fannie Mae v. Osborne,

Re: Docket #13H85CV000283, Fannie Mae v. Griffin

Steven Michael Stoehr, Esq.

Orlans Moran PLLC  
PO Box 540540,  
Waltham, MA 02454



Annette Bent

6 Rose Lane

Oxford, MA 01540

Date: 5/7/2019