

85720100102



PLAINTIFF(S): MARY M. DWYER, as Trustee of the Judea Realty Trust, and
FOUR ANGELS FOUNDATION, INC., as beneficiary of the Judea Realty Trust

ADDRESS: Mary M. Dwyer, Treasurer
Four Angels Foundation, Inc.
5 Bayview Drive Orleans, MA 02653

DEFENDANT(S): Jacqueline Cleverly

COUNTY: SUPERIOR COURT
BARNSTABLE SS

MAR 10 2025

ATTORNEY: Jeffrey S. Robbins and Joseph D. Lipchitz

ADDRESS: 131 Dartmouth Street, Suite 501 Boston, MA 02116
Telephone: (617) 723-3300

ADDRESS: 1107 Avenue of the Americas, New York, NY 10036
Susan L. Moran, Clerk

FILED

BBO: Jeffrey S. Robbins, BBO #421910, Joseph D. Lipchitz (BBO# 632637)

TYPE OF ACTION AND TRACK DESIGNATION (see reverse side)

CODE NO.	TYPE OF ACTION (specify)	TRACK	HAS A JURY CLAIM BEEN MADE?
A99	Other Contract/Business Action	F	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

***If "Other" please describe:** Breach of contract/fraud/unjust enrichment involving real estate trust.

Is there a claim under G.L. c. 93A? YES NO

Is this a class action under Mass. R. Civ. P. 23? YES NO

STATEMENT OF DAMAGES PURSUANT TO G.L. c. 212, § 3A

The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. For this form, disregard double or treble damage claims; indicate single damages only.

TORT CLAIMS
(attach additional sheets as necessary)

- A. Documented medical expenses to date:
- 1. Total hospital expenses \$ _____
 - 2. Total doctor expenses \$ _____
 - 3. Total chiropractic expenses \$ _____
 - 4. Total physical therapy expenses \$ _____
 - 5. Total other expenses (describe below) \$ _____
- Subtotal (A):** \$ _____
- B. Documented lost wages and compensation to date \$ _____
- C. Documented property damages to date \$ _____
- D. Reasonably anticipated future medical and hospital expenses \$ _____
- E. Reasonably anticipated lost wages \$ _____
- F. Other documented items of damages (describe below) \$ _____

G. Briefly describe plaintiff's injury, including the nature and extent of injury:

Despite agreeing and representing that the beneficial interest in a real estate trust needed to be revised based on hundreds of thousands of dollars in improvements, carrying costs, and related expenses paid by the Plaintiffs for the direct benefit of the defendant and her interest in the property, Defendant attempted to terminate the real estate trust without either reimbursing the plaintiffs for expenses incurred and paid for her benefit or adjusting the beneficial interest in the real estate trust.

TOTAL (A-F): \$ _____ In excess of \$100,000 +

CONTRACT CLAIMS
(attach additional sheets as necessary)

This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a).
Provide a detailed description of claim(s):

TOTAL: \$ _____

Signature of Attorney/ Unrepresented Plaintiff: X **Date:** _____

RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.

CERTIFICATION PURSUANT TO SJC RULE 1:18

I hereby certify that I have complied with requirements of Rule 5 of the Supreme Judicial Court Uniform Rules on Dispute Resolution (SJC Rule 1:18) requiring that I provide my clients with information about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.

Signature of Attorney of Record: X *Joseph D. Lipchitz* **Date:** 3/3/25