COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

DISTRICT COURTS DEPARTMENT CHELSEA DIVISION C.A. NO. XXXX-CV-XXX

ATTORNEY GENERAL for the COMMONWEALTH OF MASSACHUSETTS and THE CITY OF CHELSEA

Petitioners,

v.

[NAME] as owner of the property located at [ADDRESS], Massachusetts,

Respondents.

MOTION TO REDUCE TIME FOR NOTICE TO RESPONDENT

Now come the petitioners in the above-captioned action and move for an Order reducing the amount of time for petitioner's notice to Respondent [NAME] (as amended, second paragraph):

As grounds therefore, the petitioners states the following:

- 1. The property located at [ADDRESS] ("the Property"), is abandoned with numerous, long-standing, and recurring Code violations which pose a serious risk to the health, safety and well-being of abutters and residents of the community.
- 2. The petitioner seeks the appointment of a receiver in order to bring the Property into compliance with the Sanitary Code.
- 3. To provide the full 14 day notice to Respondents would be inappropriate for the following reasons:
 - a. There is an immediate risk to the health and safety of abutters and residents of the community, including recent police activity;

b. To provide opportunity to repair and stabilize the Property, it is necessary for the

Court to appoint a receiver in an expedited manner.

WHEREFORE, the petitioners request leave of court to give Respondent notice of a hearing to be held on March XX, XXXX at 9:00 AM on the Commonwealth's Petition to Enforce the Sanitary Code and For Appointment of a Receiver.

Respectfully submitted

MAURA HEALEY ATTORNEY GENERAL By her Attorney

Jason Piques BBO# 687743 Assistant Attorney General One Ashburton Place Boston, MA 02108

Dated: March ____, XXXX