

COMMONWEALTH OF MASSACHUSETTS

NORFOLK , ss

COURT DEPARTMENT
QUINCY DIVISION
No.

ATTORNEY GENERAL for the
COMMONWEALTH OF MASSACHUSETTS

v.

KEVIN AND MICHELLE O
as owners of the property located at
Street, Weymouth, MA

et als.

Respondents

RECEIVER'S MOTION FOR AUTHORIZATION TO DISBURSE NET PROCEEDS
FROM SALE OF RECEIVERSHIP PROPERTY

Pursuant to G.L. c. 111 sec. 127I and the inherent equity power conferred upon this Court by the receivership action, the Receiver appointed herein moves that this Court authorize the Receiver to disburse the Net Proceeds (as defined below) from the sale of the Receivership property located at Street, Weymouth, MA (the "Property") as follows:

1. \$ to James J. Cotter III, Receiver, for the Receiver's additional fees and disbursements/payables as approved by the Court;
2. \$ to Savings Fund Society, for partial sums owed through January 3, 2018 pursuant to the mortgage from Kevin and Michelle O' \$ being owed thereon to such date; and
3. \$0 to Kevin and Michelle O and any junior lienholders of record.

Total Net Proceeds \$.

In support of this motion, the Receiver states the following:

1. On or about October, 2019, the Court (Coven, J.) approved the Receiver's Motion For Authorization To Accept Offer To Purchase Property, To Execute Purchase and Sale Agreement And To Sell Property;

2. On or about January 10, 2019, the Receiver conveyed title to the Property as authorized by the Court and there were net proceeds from the sale in the sum of \$ (the "Net Proceeds") (see copy of Settlement Statement and check attached hereto);

WHEREFORE, the Receiver respectfully requests that the Court:

1. Authorize the Receiver to make the following disbursements from the Net Proceeds:

- a. \$ to the Receiver for his fees and disbursements/payables to date as approved by the Court;
- b. \$ to Savings Fund Society, ; and,

2. Grant such further relief as this Honorable Court deems just and equitable.

Receiver,
By his attorney,

James J. Cotter, III BBO 101620
P.O. Box 270
No. Quincy, MA 02171

Dated: January , 2019