NO:________________________

IN THE

SUPREME COURT OF THE UNITED STATES

ELIZABETH D'ANDREA **– PETITIONER**

VS.

JP MORGAN CHASE BANK, N.A. –

RESPONDENT(S)

ON PETITION FOR A WRIT OF CERTIORARI TO

MASSACHUSETTS SUPREME JUDICIAL COURT

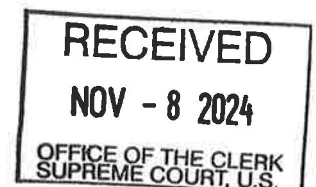
MOTION TO EXTEND DEADLINE FOR PETITION FOR WRIT OF CERTIORARI

ELIZABETH D'ANDREA

33 HIGHLAND STREET

WEBSTER, MA 01570

(508) 461-9096



MOTION FOR EXTENSION OF DEADLIE TO FILE PETITION FOR WRIT OF CERTIORARI

NOW COMES Petitioner Elizabeth D'Andrea and requests an extension of time for 60 days to file her Writ of Certiorari requesting this Honorable Courts review. Below is the general posture of this controversy as background as to its public interest and then request for extraordinary consideration of this last minute request for extension of time to file.

Petitioner was denied reconsideration of her denial for Further Appellate Review on 08/05/24, by the Massachusetts Supreme Judicial Court in JPMorgan Chase v. Shane D'Andrea and other docket no. FAR-29622 She attaches the relevant decisions in the manner that will be provided with her Petition as well as a Statement of issues and related cases including those of her four hopefully-joint petitioners.

Background and Public Interest

Petitioner Elizabeth D'Andrea is one of five petitioners herewith. All are similarly situated as jointly being denied reconsideration on the same day by the Massachusetts Supreme Judicial Court. Together they had filed for a joining of their reconsiderations of denial of their individual requests for Further Appellate Review ("FAR") of the Appeals Court decisions in the Commonwealth of Massachusetts. (Petitioner files singly because it is not clear if they were joined for

reconsideration of the denial of their FARs or not but believes for effective economic use of judicial resources the US Supreme Court is best served by reviewing them together.)

These five cases represent denials of review in hundreds of Massachusetts cases similarly situated during this 20-year period of a historic rate of foreclosures in the United States.

The Commonwealth of Massachusetts was arguably the sixth hardest hit state, as measured during the height of this foreclosure period.

Massachusetts has a legislated, modified foreclosure by sale foreclosure scheme. However, in these five cases, and close to 100% of all purported foreclosures by sale in Massachusetts, numbering in the vicinity of 125,000, the legislatively mandated procedure of review by a court of competent jurisdiction as an element of foreclosure by sale auction scheme has been systematically omitted by the foreclosing entities/"person selling" (MGL Chapter 244 §§12 & 13.) This step enacted in two parts in 1851 & 1854 was complied with through at least 1996 according to available case law. Failure to comply with the statutes compromising the scheme voids the attempted foreclosure by operation of law. (This and numerous statutory and regulatory unwaivable requirements have been systematically omitted or directly contravened in these cases.)

Instead, the foreclosing entities, if they are the foreclosure purchaser or a

third party purchaser (overwhelmingly investors) have impermissibly venue shopped to avoid a court jurisdiction legislatively authorized to determine true title controversies. The eviction proceeding by Massachusetts statute and close to 200 years of jurisprudence cannot be used to settle a true title controversy.

The Housing Courts, which now adjudicate close to 100% of these cases post-purported foreclosure, explicitly both by recent jurisprudence and statutory law are only authorized to recognize a defendant's affirmative defense or counterclaim that they remain the property title holder. Explicitly omitted is adjudication in contradiction as to the title claim of a plaintiff who commences an eviction case in the Housing Courts. These cases are brought in the Summary Process subject matter only authorized to decide possession.

While a settled title was explicitly legislated when post-purported foreclosure situations were legislatively permitted to use the traditional tenant-landlord eviction procedure with enactment in 1879 (in direct legislative correction to Massachusetts Supreme Judicial Court decisions of that year). The legislated necessity of a predetermined "valid title" was written into the statutory language, in existence to this day.

Recent SJC *stare decisis*[1] has affirmed that once it becomes "apparent" to an

---

[1] *Rental Property Management Services v. Hatcher,* 479 Mass. 542 (2018) [SJC-12373] and *Cambridge Street Realty, LLC v. Stewart,* 481 Mass. 121 (2018) [SJC 12440, SJC 12563]

eviction case judge that the eviction plaintiff may lack standing, because they are either not the owner or not the lessor, the judge in question must first resolve that standing issue, before proceeding.

In these 5 cases and thousands of others, defendant-homeowners have filed in their Answer their challenge to the Plaintiff purported purchaser's claimed standing as the preexisting title holder. In these 5 cases (and in the majority of other cases known to the 5 petitioners' extensive network of homeowner foreclosure fighters) the eviction proceeding has never been suspended for adjudication of the title or for resolving the Plaintiff's burden of proof of the ownership-requirement .

Further, extensive evidence in social science research, which numerous courts have already relied upon, has made it well recognized that the unprecedented rate of default and foreclosure proceeds from an unprecedented extent of predatory loans, known in Massachusetts jurisprudence as "doomed to foreclosure". The Massachusetts Supreme Judicial Court in *HSBC as Trustee v. Morris,* 490 Mass. 322 (2022) has recently clarified the requirement that review of the origination of the loan as to predatory violations is required. In 3 of these cases, request for review under that new *stare decisis* was denied summarily.

Further, legitimate social science research several years ago documented clear racial and gender bias in Housing Court eviction case outcomes. These 5

cases include exemplifications documented and argued as to such biases. The Massachusetts judiciary's Access to Justice Commission 2016 study found that 98% of the time defendants lose in eviction cases. All of the *prima facie* evidence of extensive and seriously damaging discrimination in the loss of your unalienable right to possession of real property under Article I of the Massachusetts Bill of Rights (Part the First of the Commonwealth's Constitution), without constitutional due process rights is also extensively documented in these 5 case records.

An associated proceeding in the Massachusetts Supreme Judicial Court in the ultimately combined 46 homeowner multi-party petition, known as *Adjartey v. Central Housing Court,* 481 Mass. 830 (2019) documented to the SJC the unequal treatment and denial of extensive due process rights by the Housing Court in these post-purported foreclosure eviction cases up to the time of the filing of that petition. Since COVID, more explicitly, the Housing Court (and two of the other 3 courts with legislated jurisdiction over eviction proceedings in Massachusetts) have published suspension of the due process rules unique to eviction cases, known as the Uniform Summary Process Rules, and have announced they will continue to so suspend them indefinitely at this time.

In every one of these cases, therefore, the suspension of all due process rules

is published from the Housing Court Division to the world.[2]

Basis of Extension to File

The petitioners herein are requesting extension of the date to file, because there are two more Further Appellate Reviews of two similarly situated litigants and cases sitting at the Massachusetts Supreme Judicial Court at this time. One of them, the factual record is a far simpler exposition of the above denials. If the Supreme Judicial Court does not take that Further Appellate Review, nor the other similarly situated homeowner (whose case lacks only the possession part of the problems experienced herein) then this matter will be fully ripe for consideration by the U.S. Supreme Court.

If, instead, the Massachusetts Supreme Judicial Court takes these two cases, and:

---

[2] The Summary Process Rules, which are unique to eviction cases in Massachusetts, were specially created:

> "The summary process statute, G.L. c. 239, and the Uniform Summary Process Rules, evidence the General Court's clear intent that possession of residential dwellings be recovered through a carefully-constructed procedure which invokes vigilant judicial supervision in situations where fundamental rights to home and shelter are uniquely and commonly susceptible to abuse." Brief, p.38, Mass. Attorney General Scott Harshbarger, *Attorney General v. Dime Savings Bank FSB,* 413 Mass. 284, (1992)

Summary Process Rule 1 includes that "Procedures in such actions that are not prescribed by these rules shall be governed by the Massachusetts Rules of Civil Procedure ...". Therefore, all due process rules that could apply to these cases are, likewise, in suspension.

(i) adjudicates all the implicated real property rights (especially as to title, mortgaging and foreclosure, but also as to possession). It would have to do so in conformance with the history of not only real property law and possession law which have further eroded since its first decision in the *U.S. Bank as Trustee v. Ibanez*, (Jan. 7, 2011). It would also have to enforce the legislated due process protective mandated statutory proceeding to review foreclosure by sale auctions, and reinstates the full panoply of summary process due process rules in their full bodied form.

Further, the Massachusetts Supreme Judicial Court needs to adjudicate these matters in compliance with the 1976 amendment to Massachusetts Bill of Rights Article I as to the explicit constitutional promulgation of equal property rights for the five protected classes listed therein.[3]

To date, in the almost 50 years since this constitutional amendment amendation, the Massachusetts Supreme Judicial Court has avoided all such review and enforcement. At best, this leaves to the lower courts what appears to be a

---

[3] Massachusetts Constitution Amendment Article CVI: Article I of Part the First of the Constitution is hereby annulled and the following is adopted:-
All people are born free and equal and have certain natural, essential and unalienable rights; among which may be reckoned the right of enjoying and defending their lives and liberties; that of acquiring, possessing and protecting property; in fine, that of seeking and obtaining their safety and happiness. Equality under the law shall not be denied or abridged because of sex, race, color, creed or national origin.

discretionary obligation, which has, in the jurisprudence of this time period, been shown to be the equivalent of allowance of discrimination. [4]

However, it is not unreasonable to hope given that these matters have now devolved to the point, arguably, of no meaningful judicial enforcement in these areas, that the Massachusetts Supreme Judicial Court will finally act and intervene and this Honorable Court will not need to take up these matters.

Request for Last Minute Extension Given Extraordinary Circumstances

Petitioner Elizabeth D'Andrea as one these hopefully five joint petitioners apologizes to the Court and requests extraordinary consideration.

The Petitioners realized from the rules, now, that they should have filed for this extension 10 days before the deadline. They had delayed in preparing, because there was every hope that the Massachusetts Supreme Judicial Court would pick up, by now, one of the other similarly situated Further Appellate Review petitions,

---

[4] In Miller v. Countrywide Bank, N.A. 571 F. Supp. 2d 251,254 (D. Mass. July 30,2008), Judge Nancy Gertner of the United States District Court for the District of Massachusetts held: "Where the allocation of subjective decision-making authority is at issue, the "practice" amounts to the *absence* of a policy that allows racial bias to seep into the process. Allowing this "practice" to escape scrutiny would enable companies responsible for complying with anti-discrimination laws to "insulate" themselves by "refrain[ing] from making standardized criteria absolutely determinative." Watson v. Fort Worth Bank, 487 U.S. 977,990 (1988)…." The allowance of such "seepage" evades the special judicial role for enforcement of equal rights and due process.

or address the case that the Supreme Judicial Court reopened for reconsideration that was heard.

This last is the *FNMA and Cardoso v. Branch,* SJC-13510 CASE. A*micus* filings into that case by Grace C Ross included irrefutable demonstration of historic level fraud on the SJC and Massachusetts Court; this was provided with Massachusetts Registries of Deeds evidence of the front page of Foreclosure Deeds in some 19,000 foreclosure by sale situations (calculated from 814 actual hard copy examples submitted to the SJC.)

These Foreclosure Deeds show a violation of Massachusetts statutory consumer and real property statutory and regulatory law. The core violations was reaffirmed as still in force in, arguably, the most famous case in this historic foreclosure crisis of *U.S. Bank National Association v. Ibanez,* 458 Mass. 637 (2011). The proof of this violation is based upon the wording published on the front of each of these Foreclosure Deeds of exercising an exemption under Massachusetts Department of Revenue law which was not available to mortgagee who published and purportedly executed these foreclosures by sale; this proves up the facts of these estimated 19,000 illegal foreclosures. Because of Massachusetts judicial requirements, this also represents 19,000 to perhaps 60,000 fraudulently entered and prosecuted judicial proceedings.

Petitioners had full faith that either that case or the 3 FARs awaiting Supreme Judicial Court acceptance or denial meant that they would not need to seek this Court's review.

Secondly, they are all *pro se*. None of them have ever even looked at U.S. Supreme Judicial Court requirements. This is also 5 *pro se* litigants needing to coordinate and work together and with their extensive nonlawyer support team. Thereby, the process of getting all of the paperwork and all the filing together, alone, is, shall we say, more than daunting.

Third, they are unfamiliar with the rules. They had to fill out new paperwork, for which their extensive network has no templates, and learn the procedures and standards for the Court, the last of which they hope they have done an acceptable job of understanding.

Fourth, this is a case worthy of preserving. Given that the historic rate of foreclosures has led to unprecedented scale of impact and harm to U.S. households. For example, during the first 4 years of the historic foreclosure crisis between 2005-2009: Latino households lost 66% of median wealth; Black households lost 54% median wealth; Asian households lost the 53% median wealth loss with 34% attributable to foreclosures.[5] While that research by the Pew Charitable Trust was

---

[5] Kochhar R, Fry R, Taylor P. Twenty-to-One: Wealth Gaps Rise to Record Highs between Whites, Blacks and Hispanics. Washington, D.C: Pew Research Center;

only done for the first 4 years of historic rates of foreclosure, foreclosures continue at an unprecedented rate in this, the 20th year of this crisis.

Research by a Northeastern Law class, guided by their professor, has also just yielded a surprising, concerning and instructive result. In their commencing their review of states with similar fundamental property law as to that of Massachusetts (for instance, the Statute of Frauds as to real property first promulgated in English law in 1673), they have found in the 4 states whose lexicon they have researched extensively at this point: in none of those states, have the kind of litigated attempts to enforce their real property laws, as exist in now extensive Massachusetts jurisprudence, even appear. That is, this critical are of real property rights – one of three unalienable rights – which has been so profoundly endangered and done so in violation of the 14th and, often, 5th Amendment, are going unchallenged in any real measure in these four state's courts. The exception is herein the Massachusetts courts with the 16-year organized homeowner actions in the Commonwealth of Massachusetts. The cases must come up from this state it appears.

As this is one of the recognized most important areas of rights, and explicitly recognized as one of the "last vestiges of slavery" that the 14th Amendment was passed to champion and finally achieve, the preservation of a full lower court

---

2011. Jul 26

record in 5 exemplary cases, (and, hopefully, a couple more added with the 60 day extension) is an opportunity for the adjudication of justice that is a unique opportunity for this Court in preserving this joint petition. This court's consideration could uniquely preserve these endangered rights and for the first time in our history, ensure them equally for all.

STATEMENT OF ISSUES

- Can the Massachusetts Courts allow the transfer of title to land as if legal, without adjudication and in direct violation of the land law and jurisprudence of the state and fail to adjudicate the title controversy put before it by the last clear title-holder in compliance with jurisprudence?
- Can a Massachusetts Court of limited jursidiction order transfer of the right to occupy and determine who is in trespass, known as "possession", in violation of the state's statutory law, jurisdictional statutes, caselaw, and Supreme Judicial Court promulgated rule, when it is explicitly an unalienable property right element in Article I of the Commonwealth's Bill of Rights requiring both Strict Judicial Scrutiny and Due Process and Procedures tailored uniquely to claims to gain possession?
- Can the equal rights as to the above unalienable property rights be refused and/or avoided in adjudication, both as to private discriminatory acts and judicial discriminatory acts?
- Can state and federal rule and law as to the limitations on the use of summary judgment be judicially ignored and functionally erased to provide the moving party and the court absolution from addressing the material difference presented by the well pled facts of the nonmoving party?
- Can the due process requirement of an evidentiary hearing and the production of proofs and the right to cross examination as to facts in material dispute be denied defendants, especially those in classes recognized to be presumptively disbelieved?
- Can all due process and any judicial review be denied as to a property right taking against the will of the present holder of that property right?

APPENDIX A

Commonwealth of Massachusetts

Appeals Court for the Commonwealth

At Boston

In the case no. 22-P-481

JPMORGAN CHASE BANK, N.A.

vs.

SHANE D'ANDREA & others.

Pending in the Central Division of the Housing Court

Ordered, that the following entry be made on the docket:

Orders entered January 26, 2022, dismissing plaintiff's amended complaint with prejudice, and dismissing defendants' counterclaims without prejudice, affirmed.

Order denying defendant Elizabeth D'Andrea's motion for reconsideration affirmed.

By the Court,

Joseph F. Stanton, Clerk

Date November 28, 2023.

NOTICE: Summary decisions issued by the Appeals Court pursuant to M.A.C. Rule 23.0, as appearing in 97 Mass. App. Ct. 1017 (2020) (formerly known as rule 1:28, as amended by 73 Mass. App. Ct. 1001 [2009]), are primarily directed to the parties and, therefore, may not fully address the facts of the case or the panel's decisional rationale. Moreover, such decisions are not circulated to the entire court and, therefore, represent only the views of the panel that decided the case. A summary decision pursuant to rule 23.0 or rule 1:28 issued after February 25, 2008, may be cited for its persuasive value but, because of the limitations noted above, not as binding precedent. See Chace v. Curran, 71 Mass. App. Ct. 258, 260 n.4 (2008).

COMMONWEALTH OF MASSACHUSETTS

APPEALS COURT

22-P-481

JPMORGAN CHASE BANK, N.A.

vs.

SHANE D'ANDREA & others.[1]

MEMORANDUM AND ORDER PURSUANT TO RULE 23.0

Defendant Elizabeth D'Andrea appeals from orders of a Housing Court judge dismissing both the summary process amended complaint of the plaintiff, JP Morgan Chase Bank, N.A. (the bank), and the defendants' counterclaims without prejudice. On appeal, Elizabeth claims, among other things, that the judge erred in dismissing the counterclaims.[2] Finding no error, we affirm.

In 2008, Dorothy Menzone, Elizabeth's mother, purchased a home at 33 Highland Street in Webster, Massachusetts (the property) by taking out a loan. In 2012, Menzone refinanced the loan, executing a note in favor of Intercontinental Capital

---

[1] Elizabeth D'Andrea, Jennifer Wilson, and Dennis Brown.

[2] Because defendants Shane D'Andrea and Elizabeth D'Andrea share the same last name, we will refer to them by their first names to avoid confusion.

Group, Inc. The loan was secured by a mortgage encumbering the property.[3] After her death on March 15, 2013, no further mortgage payments were made. On January 14, 2020, the bank purchased the property from itself at a foreclosure auction after purportedly sending the required foreclosure notices and publishing notice of the foreclosure sale.

The bank then commenced a summary process action on February 17, 2020, against Shane only, Menzone's great-grandson. On December 8, 2021, while the summary process action was pending, the bank sold the property to a third party. On December 10, 2021, two days after the sale of the property, the bank, with leave of court, served the other occupants of the property in this action with an amended summary process summons and complaint.[4] Elizabeth filed an answer to the amended complaint and counterclaims on December 31, 2021, and the other newly-added defendants filed their answer and counterclaims on January 3, 2022. On January 13, 2022, the bank moved to voluntarily dismiss the summary process action and to dismiss all counterclaims, as it no longer held title to the property. A judge held a hearing attended by Elizabeth and then dismissed the bank's claim for possession and all counterclaims without

---

[3] The mortgage was later acquired by the bank.
[4] The amended complaint added Elizabeth; Jennifer Wilson, Shane's mother; and Dennis Brown, another occupant of the property.

prejudice because it lacked subject matter jurisdiction. Elizabeth appeals from the orders.[5]

Discussion. "We review the allowance of a motion to dismiss de novo, accepting as true all factual allegations in the complaint and favorable inferences drawn therefrom." Lipsitt v. Plaud, 466 Mass. 240, 241 (2013), citing Curtis v. Herb Chambers I-95, Inc., 458 Mass. 674, 676 (2011).

In her appeal, Elizabeth offer several reasons why the Housing Court judge erred, each of which can only be addressed if the Housing Court had jurisdiction over the bank's claim and the defendants' counterclaims. See Commonwealth v. Doughty, 491 Mass. 788, 805 (2023) ("Subject matter jurisdiction concerns the power of the court to entertain a particular category of case"). Accordingly, we begin our analysis with the issue of whether the Housing Court judge erred in dismissing either the bank's claim for possession or the defendants' counterclaims.

1. Dismissal of summary process action. The Housing Court is a court of limited jurisdiction. LeBlanc v. Sherwin Williams Co., 406 Mass. 888, 896 (1990). General Laws c. 185C, § 3, gives the Housing Court jurisdiction over claims involving "the possession, condition, or use of any particular housing

[5] Elizabeth has waived her appeal of the order denying her motion for reconsideration. See Mass. R. A. P. 16 (a) (9) (A), as appearing in 481 Mass. 1628 (2019).

accommodations." Here, it is undisputed that at the time of the filing of the bank's motion to dismiss, the bank was not the owner of the property because it had transferred whatever interest it had in the property to a third party via a quitclaim deed. "Where, as here, the plaintiff is neither the owner nor the lessor of the property, the plaintiff has no standing to bring a summary process action." Rental Prop. Mgt. Servs. v. Hatcher, 479 Mass. 542, 546 (2018). "[L]egal standing is a jurisdictional matter; if parties do not have standing, a court has no jurisdiction to adjudicate their claims." Matter of Chapman, 482 Mass. 1012, 1015 (2019).

After the bank sold its entire interest in the property, its claim for possession became moot and the bank properly informed the court of its change in status by filing a motion for voluntary dismissal. The judge then acted correctly by scheduling the matter for a hearing and providing the defendants an opportunity to be heard. Because it is undisputed that the bank no longer even purported to own any interest in the property, it was not only proper, but also required for the Housing Court to dismiss the bank's summary process action.[6] There was no error.

---

[6] Elizabeth appears mistakenly to believe that the order of dismissal here include a judgment on the merits that the bank owned the property, a question on which we express no opinion. Moreover, the order dismissing the bank's claim for possession

2. Dismissal of counterclaims. We next address whether the court had jurisdiction over the counterclaims once the summary process action had been properly dismissed. In a summary process action following foreclosure, "[an] occupant facing eviction may assert that the power of sale was not strictly complied with and that the foreclosure is therefore void . . . [and] other affirmative defenses or counterclaims, such as those based on violations of G. L. c. 93A or G. L. c. 151B, and may seek possession, monetary damages, or other equitable relief." Federal Nat'l Mtge. Ass'n v. Rego, 474 Mass. 329, 339 (2016).

Elizabeth's answer and counterclaims challenged, among other things, the validity of the mortgage loan transaction and the foreclosure sale and alleged unfair business practices under G. L. c. 93A. There is no doubt that, in adjudicating a summary process action, the Housing Court has the authority to consider an affirmative defense or counterclaim challenging the validity of the foreclosure sale. Here, however, the Housing Court did not have jurisdiction over any of the defendants' counterclaims for the same reasons it did not have jurisdiction over the

---

was with prejudice. We also note that the judge had no duty at any time before issuing his order of dismissal to determine, sua sponte, whether the bank had standing to bring this action in the first place.

bank's summary process action. As noted above, the bank no longer claims to own any interest in the property and the bank's claim to superior right of possession was moot once its property interests were transferred. In fact, at the time Elizabeth filed her counterclaims, the transfer of the property was already complete. The Housing Court correctly noted that "untethered from a claim for possession, the Housing Court is without jurisdiction under G. L. c. 185C to adjudicate post-foreclosure title issues pertaining to the validity of a mortgage loan transaction or the validity of a foreclosure sale." Also as noted by the Housing Court judge, the defendants are not without a forum to challenge the validity of the foreclosure sale in a court of competent jurisdiction, and, should the purchaser of the bank's interest bring a summary process action, some of the bases of the counterclaims might perhaps be raised as defenses and counterclaims there, something about which, again, we express no opinion. We also express no opinion on the merits of the defendants' claims.

Conclusion. Because the Housing Court did not have jurisdiction to adjudicate either the summary process action or the defendants' counterclaims, we affirm the orders entered January 26, 2022, dismissing the plaintiff's amended complaint with prejudice and the defendants' counterclaims without

prejudice. The order denying defendant Elizabeth D'Andrea's motion for reconsideration is affirmed.

So ordered.

By the Court (Rubin, Neyman & Walsh, JJ.[7]),

Clerk

Entered: November 28, 2023.

[7] The panelists are listed in order of seniority.

Commonwealth of Massachusetts
SUPREME JUDICIAL COURT

It is ORDERED that the following applications for further appellate review be, and hereby are, DENIED:

FAR-29622 2022-P-0481	JPMorgan Chase Bank, N.A. v Elizabeth D'Andrea et al
FAR-29775 2023-P-0393	Commonwealth v Alexandr Ivanenko
FAR-29776 2023-P-0563	Commonwealth v Peter J. Chongarlides, Sr.
FAR-29782 2022-P-0733	Ruth Adjartey v Santander Bank, N.A.
FAR-29785 2022-P-1020	Commonwealth v Keith D. Correia
FAR-29795 2023-P-0629	P.J. Keating Company v Board of Health of Acushnet et al
FAR-29804 2022-P-0550	Commonwealth v Salome Gil
FAR-29805 2023-P-0582	Joanne M Petitpas v Jesse W St. Gelais
FAR-29806 2023-P-0679	
FAR-29806B 2023-P-0679	
FAR-29807 2023-P-0319	Lisa Antonelli Jones v Ryne Steven Johnson et al
FAR-29808 2022-P-1034	Commonwealth v Mark L. Gaglini
FAR-29809 2023-P-1008	N.S. v S.S.
FAR-29813 2023-P-0722	Commonwealth v Jeanine M. Cappello
FAR-29814 2023-P-0286	
FAR-29819 2023-P-0390	Commonwealth v Steven Rios
FAR-29821 2022-P-0925	Commonwealth v Marcos Gomez
FAR-29822 2023-P-0145	Commonwealth v Benjamin Ramirez-Lopez

By the Court,

Maura A. Looney
Acting Clerk

Entered: June 27, 2024

EXHIBIT C

Outlook

FAR-29622 - Notice of docket entry

From SJC Full Court Clerk <SJCCommClerk@sjc.state.ma.us>
Date Mon 8/5/2024 7:24 PM
To liz3211@live.com <liz3211@live.com>

Supreme Judicial Court for the Commonwealth of Massachusetts

Telephone

RE: No. FAR-29622

JPMORGAN CHASE BANK, N.A.
vs.
SHANE D'ANDREA & others

NOTICE OF DOCKET ENTRY

Please take note that on August 5, 2024, the following entry was made on the docket.

DENIAL of petition to reconsider denial of FAR application.

Very truly yours,

The Clerk's Office

Dated: August 5, 2024

To:
Dallin Rex Wilson, Esquire
Anne Virginia Dunne, Esquire
Elizabeth D'Andrea

Additional material from this filing is available in the Clerk's Office.

Grace C Ross
10 Oxford St. #2R
Worcester, MA 01609

I, __Grace C Ross__ being duly sworn, do hereby depose and swear of my own personal knowledge as follows:

1. I have been engaged as a special processor on behalf of the following petitioner: Elizabeth D'Andrea, 33 Highland Street, Webster, MA 01570.

2. In the case of the petition of Elizabeth D'Andrea, I swear that on November 4, 2024 I mailed by first class the documents provided to me by D'Andrea, including a motion to extend the time to file, a motion as to extraordinary circumstances, and a *forma pauperis* on JPMorgan Chase Bank, N.A. to their attorneys of record in D'Andrea's Massachusetts Supreme Judicial Court case requesting Further Appellate Review, docket # FAR-29622:

3.

- Dallin Rex Wilson, Esq., Seyfarth Shaw LLP, Seaport East, Two Seaport Lane, Suite 1200, Boston, MA 02210;
- Anne Virginia Dunne, Esq., Greenberg Traurig, One International Place, Suite 2000, Boston, MA 02110.

Signed under pains and penalty of perjury,

Grace C Ross
10 Oxford St. #2R
Worcester, MA 01609

Date: November 4, 2024