


CIVIL ACTION COVER SHEET	DOCKET NUMBER 23-0264E	Trial Court of Massachusetts The Superior Court	
		COUNTY Suffolk Superior Court (Boston)	

Plaintiff: Charles and Cambridge Corner LLC	Defendant: 147 Charles Holdings LLC
ADDRESS: 171 Newbury Street Boston, MA 02115	ADDRESS: 217 Hanover Street, #184, Boston, MA 02113 Brahma Development LLC, 267 Commonwealth Ave, Ste. A, Boston, MA 02116 JJ Hardscape Inc., 32 Bennet Avenue, Saugus, MA 01906
Plaintiff Attorney: Roger L. Smerage, Bradley L. Croft, Christopher R. Agostino	Defendant Attorney:
ADDRESS: Ruberto, Israel & Weiner, P.C. 255 State Street, 7th Floor Boston, MA 02109	ADDRESS:
BBO: 675388, 633347, 664521	BBO:

TYPE OF ACTION AND TRACK DESIGNATION (see instructions section below)

CODE NO. B04	TYPE OF ACTION (specify) Other Negligence - Personal Injury/prop damage	TRACK F	HAS A JURY CLAIM BEEN MADE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
------------------------	-----------------------------------------------------------------------------------	-------------------	----------------------------------------------------------------------------------------------------

*If "Other" please describe:

Is there a claim under G.L. c. 93A? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Is there a class action under Mass. R. Civ. P. 23? <input type="checkbox"/> YES <input checked="" type="checkbox"/> 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

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 (1-5):	\$0.00
B. Documented lost wages and compensation to date	
C. Documented property damages to date	\$6,100.00
D. Reasonably anticipated future medical and hospital expenses	
E. Reasonably anticipated lost wages	
F. Other documented items of damages (describe below)	\$211,100.00
TOTAL (A-F):	\$1,177,200.00

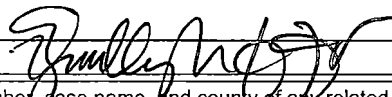
SUFFOLK SUPERIOR COURT
CIVIL CLERK'S OFFICE
2023 JAN 31 12:55

G. Briefly describe plaintiff's injury, including the nature and extent of injury:
 Defendants have caused damage to Plaintiff's real property and rental income through their negligent excavation of the abutting property

CONTRACT CLAIMS

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

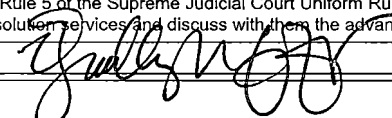
Item #	Detailed Description of Each Claim	Amount
1.	Breach of Neighbor Agreement	\$1,177,200.00
Total		\$1,177,200.00

Signature of Attorney/Unrepresented Plaintiff: X  Date: **January 30, 2023**

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/Unrepresented Plaintiff: X  Date: **1/30/2023**