

CIVIL ACTION COVER SHEET

DOCKET NUMBER

**Trial Court of Massachusetts
The Superior Court**



COUNTY Suffolk Superior Court (Boston)

Plaintiff Vinay Mehra	Defendant: Boston Globe Media Partners, LLC
ADDRESS: 60 Solon Street Newton, MA, 02461	ADDRESS: 1 Exchange Place Boston, MA 02109
Plaintiff Attorney: Rebecca Pontikes	Defendant Attorney: Mark Batten, Proskauer Rose
ADDRESS: 10 Tremont Street 3rd Floor Boston, MA 02108	ADDRESS: One International Place Boston, MA 02110
BBO: 637157	BBO:

TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)

CODE NO. A01	TYPE OF ACTION (specify) Wage Act, MGL c. 149, sec. 148, 148A, 150	TRACK F	HAS A JURY CLAIM BEEN MADE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
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*If "Other" please describe:

Is there a claim under G.L. c. 93A?

YES NO

Is there a class action under Mass. R. Civ. P. 23?

YES NO

STATEMENT OF DAMAGES REQUIRED BY 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. (Note to plaintiff: for this form, do not state double or treble damages; 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

\$6,000,000.00

C. Documented property damages to date

D. Reasonably anticipated future medical and hospital expenses

E. Reasonably anticipated lost wages

\$5,000,000.00

F. Other documented items of damages (describe below)

TOTAL (A-F): 11,000,000

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

Defendant refused to pay Plaintiff's commission and terminated him in retaliation for seeking his rights under the Wage Act.

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.	Failure to pay commission owed	\$1,000,000.00
2.	Failure to pay contractual severance	\$170,000.00
Total		\$1,170,000.00

Signature of Attorney/Self-Represented Plaintiff: X

Date: 6/29/2023

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

Docket Number

CERTIFICATION UNDER S.J.C. RULE 1:18(5)

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

Signature of Attorney: X _____



Date: 6/29/2023

CIVIL ACTION COVER SHEET INSTRUCTIONS — SELECT A CATEGORY THAT BEST DESCRIBES YOUR CASE*

<p>AC Actions Involving the State/Municipality†*</p> <p>AA1 Contract Action involving Commonwealth, Municipality, MBTA, etc. (A)</p> <p>AB1 Tortious Action involving Commonwealth, Municipality, MBTA, etc. (A)</p> <p>AC1 Real Property Action involving Commonwealth, Municipality, MBTA etc. (A)</p> <p>AD1 Equity Action involving Commonwealth, Municipality, MBTA, etc. (A)</p> <p>AE1 Administrative Action involving Commonwealth, Municipality, MBTA, etc. (A)</p> <p style="text-align: center;">CN Contract/Business Cases</p> <p>A01 Services, Labor, and Materials (F)</p> <p>A02 Goods Sold and Delivered (F)</p> <p>A03 Commercial Paper (F)</p> <p>A04 Employment Contract (F)</p> <p>A05 Consumer Revolving Credit - M.R.C.P. 8.1 (F)</p> <p>A06 Insurance Contract (F)</p> <p>A08 Sale or Lease of Real Estate (F)</p> <p>A12 Construction Dispute (A)</p> <p>A14 Interpleader (F)</p> <p>BA1 Governance, Conduct, Internal Affairs of Entities (A)</p> <p>BA3 Liability of Shareholders, Directors, Officers, Partners, etc. (A)</p> <p>BB1 Shareholder Derivative (A)</p> <p>BB2 Securities Transactions (A)</p> <p>BC1 Mergers, Consolidations, Sales of Assets, Issuance of Debt, Equity, etc. (A)</p> <p>BD1 Intellectual Property (A)</p> <p>BD2 Proprietary Information or Trade Secrets (A)</p> <p>BG1 Financial Institutions/Funds (A)</p> <p>BH1 Violation of Antitrust or Trade Regulation Laws (A)</p> <p>A99 Other Contract/Business Action - Specify (F)</p> <p style="font-size: small;">* See Superior Court Standing Order 1-88 for an explanation of the tracking deadlines for each track designation: F, A, and X. On this page, the track designation for each case type is noted in parentheses.</p> <p style="font-size: small;">†* Choose this case type if ANY party is the Commonwealth, a municipality, the MBTA, or any other governmental entity UNLESS your case is a case type listed under Administrative Civil Actions (AA).</p> <p style="font-size: small;">‡ Choose this case type if ANY party is an incarcerated party, UNLESS your case is a case type listed under Administrative Civil Actions (AA) or is a Prisoner Habeas Corpus case (E97).</p>	<p style="text-align: center;">ER Equitable Remedies</p> <p>D01 Specific Performance of a Contract (A)</p> <p>D02 Reach and Apply (F)</p> <p>D03 Injunction (F)</p> <p>D04 Reform/ Cancel Instrument (F)</p> <p>D05 Equitable Replevin (F)</p> <p>D06 Contribution or Indemnification (F)</p> <p>D07 Imposition of a Trust (A)</p> <p>D08 Minority Shareholder's Suit (A)</p> <p>D09 Interference in Contractual Relationship (F)</p> <p>D10 Accounting (A)</p> <p>D11 Enforcement of Restrictive Covenant (F)</p> <p>D12 Dissolution of a Partnership (F)</p> <p>D13 Declaratory Judgment, G.L. c. 231A (A)</p> <p>D14 Dissolution of a Corporation (F)</p> <p>D99 Other Equity Action (F)</p> <p style="text-align: center;">PA Civil Actions Involving Incarcerated Party ‡</p> <p>PA1 Contract Action involving an Incarcerated Party (A)</p> <p>PB1 Tortious Action involving an Incarcerated Party (A)</p> <p>PC1 Real Property Action involving an Incarcerated Party (F)</p> <p>PD1 Equity Action involving an Incarcerated Party (F)</p> <p>PE1 Administrative Action involving an Incarcerated Party (F)</p> <p style="text-align: center;">TR Torts</p> <p>B03 Motor Vehicle Negligence - Personal Injury/Property Damage (F)</p> <p>B04 Other Negligence - Personal Injury/Property Damage (F)</p> <p>B05 Products Liability (A)</p> <p>B06 Malpractice - Medical (A)</p> <p>B07 Malpractice - Other (A)</p> <p>B08 Wrongful Death - Non-medical (A)</p> <p>B15 Defamation (A)</p> <p>B19 Asbestos (A)</p> <p>B20 Personal Injury - Slip & Fall (F)</p> <p>B21 Environmental (F)</p> <p>B22 Employment Discrimination (F)</p> <p>BE1 Fraud, Business Torts, etc. (A)</p> <p>B99 Other Tortious Action (F)</p> <p style="text-align: center;">RP Summary Process (Real Property)</p> <p>S01 Summary Process - Residential (X)</p> <p>S02 Summary Process - Commercial/ Non-residential (F)</p>	<p style="text-align: center;">RP Real Property</p> <p>C01 Land Taking (F)</p> <p>C02 Zoning Appeal, G.L. c. 40A (F)</p> <p>C03 Dispute Concerning Title (F)</p> <p>C04 Foreclosure of a Mortgage (X)</p> <p>C05 Condominium Lien & Charges (X)</p> <p>C99 Other Real Property Action (F)</p> <p style="text-align: center;">MC Miscellaneous Civil Actions</p> <p>E18 Foreign Discovery Proceeding (X)</p> <p>E97 Prisoner Habeas Corpus (X)</p> <p>E22 Lottery Assignment, G.L. c. 10, § 28 (X)</p> <p style="text-align: center;">AB Abuse/Harassment Prevention</p> <p>E15 Abuse Prevention Petition, G.L. c. 209A (X)</p> <p>E21 Protection from Harassment, G.L. c. 258E(X)</p> <p style="text-align: center;">AA Administrative Civil Actions</p> <p>E02 Appeal from Administrative Agency, G.L. c. 30A (X)</p> <p>E03 Certiorari Action, G.L. c. 249, § 4 (X)</p> <p>E05 Confirmation of Arbitration Awards (X)</p> <p>E06 Mass Antitrust Act, G.L. c. 93, § 9 (A)</p> <p>E07 Mass Antitrust Act, G.L. c. 93, § 8 (X)</p> <p>E08 Appointment of a Receiver (X)</p> <p>E09 Construction Surety Bond, G.L. c. 149, § 29, 29A (A)</p> <p>E10 Summary Process Appeal (X)</p> <p>E11 Worker's Compensation (X)</p> <p>E16 Auto Surcharge Appeal (X)</p> <p>E17 Civil Rights Act, G.L. c.12, § 11H (A)</p> <p>E24 Appeal from District Court Commitment, G.L. c.123, § 9(b) (X)</p> <p>E94 Forfeiture, G.L. c. 265, § 56 (X)</p> <p>E95 Forfeiture, G.L. c. 94C, § 47 (F)</p> <p>E99 Other Administrative Action (X)</p> <p>Z01 Medical Malpractice - Tribunal only, G.L. c. 231, § 60B (F)</p> <p>Z02 Appeal Bond Denial (X)</p> <p style="text-align: center;">SO Sex Offender Review</p> <p>E12 SDP Commitment, G.L. c. 123A, § 12 (X)</p> <p>E14 SDP Petition, G.L. c. 123A, § 9(b) (X)</p> <p style="text-align: center;">RC Restricted Civil Actions</p> <p>E19 Sex Offender Registry, G.L. c. 6, § 178M (X)</p> <p>E27 Minor Seeking Consent, G.L. c.112, § 12S(X)</p>
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TRANSFER YOUR SELECTION TO THE FACE SHEET

EXAMPLE:

CODE NO.	TYPE OF ACTION (specify)	TRACK	HAS A JURY CLAIM BEEN MADE?
B03	Motor Vehicle Negligence-Personal Injury	<u> F </u>	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A

DUTY OF THE PLAINTIFF — On the face of the Civil Action Cover Sheet (or on attached additional sheets, if necessary), the plaintiff shall state the facts on which the plaintiff relies to determine money damages. A copy of the completed Civil Action Cover Sheet, including the statement concerning damages, shall be served with the complaint. **A clerk-magistrate shall not accept for filing a complaint, except as otherwise provided by law, unless it is accompanied by such a statement signed by the attorney or self-represented litigant.**

DUTY OF THE DEFENDANT — If the defendant believes that the statement of damages filed by the plaintiff is inadequate, the defendant may file with the defendant's answer a statement specifying the potential damages which may result if the plaintiff prevails.

**A CIVIL ACTION COVER SHEET MUST BE FILED WITH EACH COMPLAINT.
 IF THIS COVER SHEET IS NOT FILLED OUT THOROUGHLY AND
 ACCURATELY, THE CASE MAY BE DISMISSED.**