

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III)
JENNIFER J. ADAMS)
Plaintiffs)

vs.)

SOPHIE J. TORRES)
JESSE E. TORRES IV)
DEBTMERICA, LLC.)
DONALD F. TORRES)
Defendants)

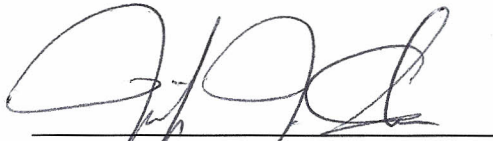
Civil Docket # BACV2011-00433

PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGEMENT
AGAINST THE DEFENDANT SOPHIE J. TORRES

The Plaintiffs Jennifer J. Adams and Jesse E. Torres III, in accordance with the provisions of M.R.C.P. 56, respectfully move for Summary Judgment of Count I through Count IV of the Plaintiffs' Complaint specific to the Defendant Sophie J. Torres.

As grounds for this Motion, the Plaintiffs state that the Defendant Sophie J. Torres did enter into a binding contract with the Plaintiff Jesse E. Torres III on April 24, 2009 (Contract) and that said Contract was both witnessed and notarized, and contains specific, clear and concise language as to the terms of the Contract and the penalties for breach thereof. The Defendant Sophie J. Torres did breach said Contract. The Plaintiffs state that the Contract, Complaint, Memorandum, Concise Statement, Affidavit and Exhibits, filed herewith, show that there is no genuine issue as to any material fact and that the moving parties are entitled to a judgment as a matter of law. In further support of this motion, the Plaintiffs rely on the aforementioned documents and those enclosed herewith.

Respectfully submitted,



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Respectfully submitted,



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