

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

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JESSE E. TORRES III )  
 JENNIFER J. ADAMS )  
 Plaintiffs )  
 vs. )  
 SOPHIE J. TORRES )  
 JESSE E. TORRES IV )  
 DEBTMERICA, LLC. )  
 DONALD F. TORRES )  
 Defendants )

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Civil Docket # BACV2011-00433

**PLAINTIFFS' EMERGENCY MOTION FOR CHANGE OF VENUE**

NOW COMES THE PLAINTIFFS in the above entitled action and moves that this action be transferred to a Superior Court within Massachusetts that is far enough away to not have been directly influenced by the *“Impeachment of Judge Shirley R. Lewis”* which was central to Barnstable County, and a national news story for over two years.

The Plaintiffs herein rely on the facts contained in their *“Plaintiffs' Memorandum of Facts Surrounding the Actions of the Barnstable Superior Court Clerks Office in the above entitled matter”* as if specifically contained herein.

Those facts set forth that the Clerk's Office did not schedule the Plaintiffs' motions for hearings, did not file the Plaintiffs' motions for a scheduled and in-process hearing and over-charged the Indigent Plaintiffs for unnecessary Summons while refusing to grant a refund. The Clerk's Office most recently did not, as had been agreed, send to the Plaintiffs electronic notice of the apparently scheduled Rule 16 Conference, only a message left on Skype. All

these facts, with the exception of the above mentioned most recent fact, are part of the Court's record and transcripts. These facts are provided in detail, in the Plaintiffs' above-named Memorandum.

**WHEREFORE** the Plaintiffs pray that their case be transferred to an untainted Massachusetts County that was not so directly influenced by, nor is as familiar with, the Impeachment effort against Barnstable County Probate Judge Shirley R. Lewis, founded and co-chaired by the Plaintiff Jesse E. Torres III. To deny this motion would deny them their rights under the Seventh Amendment of the United States Constitution, Part 1, Article 15 of the Massachusetts Constitution and under the Due Process clauses of the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution.

Respectfully submitted,

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