

**MASSACHUSETTS APPELLATE PROCEDURE RULE 16(L) LETTER**

**Torres v. Torres**

**No. 2012-P-0524 - Lower Ct. No.: BACV2011-00433**

April 12, 2013

Honorable Joseph Stanton, Clerk  
Clerk of the Appeals Court  
John Adams Courthouse, Suite 1200,  
One Pemberton Square,  
Boston, MA 02108-1705

Dear Mr. Stanton,

In reference to the review by this Court of the dismissal of Counts V – IX (Record Appendix Exhibits, Our Oppositions to the Defendants Motions to Dismiss for: Sophie J. Torres - A-80, Debtmerica - A182 and Jesse E. Torres IV – A135). The following cases were referenced in our briefs to this Court but not allowed in our oral argument in the lower court, which we believe are being reviewed by this Honorable Court.

In the interest of Judicial Economy, while the Defendants filed three (3) separate 12(b)(6) motions to dismiss, our Opposition to Defendant Jesse E. Torres IV contains the following cases for consideration by this Court:

18 U.S. Code A. 2422 .....	Pg. 19 (A153)
18 U.S. Code C. 19.373 .....	Pg. 19 (A153)
Bell Atlantic Corp. v. Twombly .....	Pg. 11 (A145)
Coraccio, 415 Mass at 147.....	Pg. 7,19 (A141, A153)
Correllas v. Viveiros, 410 Mass. 314 (1991) .....	Pg. 18 (A152)
Ferguson v, Omnimedia, Inc, 469 F.2 <sup>nd</sup> 194, 198 (1 <sup>st</sup> Cir.1972) .....	Pg. 15, 20 (A149, A154)
Hub Assoc. v. Goode .....	Pg. 15 (A149)
Nat. Bank & Trust Co. of Chicago, 529 1257, 1261 (7 <sup>th</sup> Cir. 1876) .....	Pg. 15 (A149)
Ohio Bldg. Restoration, Inc. ....	Pg. 8, 13 (A142, A147)
Sherman v. Hallauer .....	Pg. 12 (A146)
Sullivan v. Birmingham, 11 Mass. Ct. 359 (1981) .....	Pg. 17 (A151)
Tafflin v. Levitt, 493 U.S. 455 (1990) .....	Pg. 18 (A152)
Walker v. Cronin 565 (1871) .....	Pg. 11 (A145)
U.S. Code 1962 .....	Pg. 18 (A152)

If I may be of any further assistance in this matter, please don't hesitate to ask.

Sincerely,

Jesse E. Torres III

cc: Jeremy Carter, Esq., Cindy Nuzzolo, Esq.