

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 Action No. _____

EX PARTE MOTION FOR RESTRAINING ORDER

The Plaintiffs move this Court to issue a Restraining Order to protect the Plaintiffs from bodily and emotional harm by the Defendant Donald F. Torres and his associates.

In support of this motion, the Plaintiffs reallege and reassert paragraphs 1 through 134 of their Complaint, which are incorporated herein by reference and further that:

1. the filing of this action will more likely than not, place the Plaintiffs health, well-being and lives in danger, as the Defendant Donald F. Torres and his associates have threatened and intimidated the Plaintiffs in the past, and
2. this action sets forth, and clearly documents the history of said Defendant, whose actions are part of the numerous RICO violations set forth in this action, and
3. this action sets forth numerous international and interstate acts of extortion, violence and intimidation against the Plaintiffs by said Defendant and his associates, including well documented threats on their lives.

WHEREFORE, the Plaintiffs pray that this Court issue an order:

1. prohibiting Defendant Donald F. Torres and his associates from coming within one-thousand (1000) yards of the Plaintiffs, and
2. [that] the Defendant Donald F. Torres and his associates be prohibited from communicating any threats against the Plaintiffs, and
3. any other protections as this Court deems just and proper.

Jesse E. Torres III, Pro Se
562 Waquoit Highway
East Falmouth, MA 02536
(617) 291-0862

Dated July 21, 2011

CERTIFICATE OF SERVICE

I, Jesse E. Torres III, hereby certify that on July 20, 2011, I have served the Defendants Sophie J. Torres, Jesse E. Torres IV and Debtmerica, LLC, through their attorneys of record, a true copy of this document by postage prepaid U.S. Mail.

Jesse E. Torres III, Pro Se