

No. _____

Supreme Court of the United States

CHASE HUNTER,
Petitioner,

v.

JOANNE AUCLAIR,
Respondent.

On Petition for Writ of Certiorari to the Supreme
Judicial Court of the Commonwealth of
Massachusetts

PETITIONER'S APPENDIX FOR
PETITION FOR WRIT OF CERTIORARI

Chase Hunter, *Petitioner*
Pro Se
PO Box 2144
Springfield, MA 01101
USOneLove@pandgmail.com
Tel: 413-309-3866

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APPENDIX A

COMMONWEALTH OF MASSACHUSETTS
APPEALS COURT

23-P-1503

IN THE MATTER OF THE ESTATE OF
DARLENE JOYCE CALABRESE.

Order

On July 9, 2022, Darlene Joyce Calabrese died intestate, leaving behind two daughters, Joanne Auclair and Chase Hunter. This appeal arises from Auclair's petition for formal probate of Calabrese's estate. Hunter filed an objection and now appeals from several orders entered by a judge of the Probate and Family Court prior to final judgment.

"Generally, a litigant is entitled to appellate review of a final judgment, not of an interlocutory ruling." *Lynch v. Crawford*, 483 Mass. 631, 634 (2019). "Under G. L. c. 215, § 9, a party may claim an appeal from decisions of the Probate Court. Under this provision, a party may claim an appeal from interlocutory orders as well as final judgments, but absent a report from the trial judge, G. L. c. 215, § 13, an appeal from an interlocutory order will not be heard by an appellate court until a final judgment has been entered." *Borman v. Borman*, 378 Mass. 775, 779 (1979).

Here, Hunter appeals from orders denying her motion to disqualify counsel, denying her motion for an evidentiary hearing, denying her motions for reconsideration, and an order appointing a special personal representative. Because these orders were interlocutory rulings, the appellant is not entitled to

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appellate review of the rulings prior to entry of judgment.¹ See *Linder v. Pollak*, 102 Mass. App. Ct. 386, 390 (2023). In addition, Hunter's notice of appeal was untimely with respect to each of these orders, except the order appointing a special personal representative. See *DeLucia v. Kfoury*, 93 Mass. App. Ct. 166, 170 (2018) ("timely notice of appeal is a jurisdictional prerequisite to our authority to consider any matter on appeal").

Moreover, to the extent Hunter has a right of appeal on any of these orders, a single justice of this court already denied Hunter's requests for relief from five of them.² Hunter advances no legal argument that the single justice abused his discretion by denying her request for relief, nor does Hunter demonstrate that the judge erred by ordering the appointment of a special personal representative. In any event, we discern no error or abuse of discretion in any of the single justice's orders. See *Commonwealth v. Jordan*, 469 Mass. 134, 143-144 (2014).

Accordingly, we dismiss the appeal.³

¹ Hunter also attempts to appeal (or correct) 1) a docket entry that was entered in error and subsequently deleted, and 2) an email from a court employee referring Hunter to certain docket entries. To the extent that either the entry or email can be construed as an order, they are both interlocutory in nature and not properly before us.

² The single justice denied relief from the orders denying Hunter's motions for reconsideration of the judge's decisions on Hunter's motion to disqualify counsel and motion for an evidentiary hearing. However, Hunter did not request relief from the original orders denying her motions to disqualify counsel and for an evidentiary hearing.

³ Auclair seeks an award of appellate attorney's fees and costs pursuant to Mass. R. A. P. 25, as appearing in 481 Mass. 1654 (2019), on the ground that Hunter's appeal is frivolous. See G.

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Appeal dismissed.

By the Court (Vuono,
Brennan & D'Angelo, JJ.⁴),

A handwritten signature in cursive script, appearing to read "Paul Little".

Clerk

Entered: February 27, 2025.

L. c. 211A, § 15. Because Hunter had "no reasonable expectation of a reversal," *Allen v. Batchelder*, 17 Mass. App. Ct. 453, 458 (1984), we agree that her appeal was frivolous, and an award of appellate attorney's fees and costs is appropriate. See *Avery v. Steele*, 414 Mass. 450, 455-457 (1993). Consistent with the requirements of *Fabre v. Walton*, 441 Mass. 9, 10 (2004), Auclair may file a request for appellate attorney's fees and costs, along with supporting documentation, within fourteen days of the issuance of the decision in this case. Hunter shall have fourteen days thereafter within which to respond.

⁴ The panelists are listed in order of seniority.

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APPENDIX B

From: Appeals Court Clerk's Office
<AppealsCtClerk@appct.state.ma.us>
Sent: Friday, February 28, 2025 1:00 PM
To: onelove@pandgmail.com
Subject: 2023-P-1503 - Notice of Order
COMMONWEALTH OF MASSACHUSETTS
APPEALS COURT CLERK'S OFFICE
RE: No. 2023-P-1503

Lower Court No. HD22P2394EA

In the matter of : Calabrese, Darlene Joyce

NOTICE OF DOCKET ENTRY

Please take note that, with respect to the Motion for enlargement of time to file motion for reconsideration filed by Chase Hunter. (Paper #61), on February 28, 2025, the following entry was made on the docket:

RE#61: : Allowed to 04/14/2025 for filing a motion under Mass. R. A. P. 27. No further enlargements. (Vuono, Brennan, D'Angelo, JJ.). *Notice.

IMPORTANT INFORMATION ABOUT
ELECTRONICALLY FILING IN THE APPEALS
COURT

- Every attorney with an appeal pending in the Appeals Court must have an account with eFileMA.com. Registration with eFileMA.com constitutes consent to receive electronic notification from the Appeals Court and e-service of documents. Self-represented litigants are encouraged, but not required, to register for electronic filing.

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- All documents may, and some must, be electronically filed with the Appeals Court using eFileMA.com. No paper original or copy of any e-filed document is required.
- E-filing impounded documents or e-filing by self-represented litigants is voluntary.
- Additional information is located on our Electronic Filing web page:
<https://www.mass.gov/guides/electronic-filing-at-the-appeals-court>.
- Appeals Court forms, including some in multiple languages, are available at:
<https://www.mass.gov/lists/appeals-court-forms> .

Very truly yours,

The Clerk's Office

Dated: February 28, 2025

To: Jeffrey Michael Siegel, Esquire
Chase Hunter
Jonathan Levin, Esquire

Appeals Court Clerk's Office

Address: John Adams Courthouse
One Pemberton Square, Suite 1200
Boston, Massachusetts 02108-1705

Website: www.mass.gov/orgs/appeals-court

Phone: [\(617\) 921-4443](tel:(617)921-4443)

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APPENDIX C

From: Appeals Court Clerk's Office
<AppealsCtClerk@appct.state.ma.us>
Sent: Tuesday, April 15, 2025 4:01 PM
To: onelove@pandgmail.com
Subject: 2023-P-1503 - Notice of Order

COMMONWEALTH OF MASSACHUSETTS

APPEALS COURT CLERK'S OFFICE

RE: No. 2023-P-1503

Lower Court No. HD22P2394EA

In the matter of : Calabrese, Darlene Joyce

NOTICE OF DOCKET ENTRY

Please take note that, with respect to the Motion for Reconsideration or modification of decision filed by Chase Hunter. (Paper #66), on April 15, 2025, the following entry was made on the docket:

RE#66: After consideration, the motion filed pursuant to Rule 27 is denied. (Vuono, Brennan, D'Angelo, JJ.) *Notice

**IMPORTANT INFORMATION ABOUT
ELECTRONICALLY FILING IN THE APPEALS
COURT**

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- All documents may, and some must, be electronically filed with the Appeals Court using eFileMA.com. No paper original or copy of any e-filed document is required.
- E-filing impounded documents or e-filing by self-represented litigants is voluntary.
- Additional information is located on our Electronic Filing web page:
<https://www.mass.gov/guides/electronic-filing-at-the-appeals-court>.
- Appeals Court forms, including some in multiple languages, are available at:
<https://www.mass.gov/lists/appeals-court-forms> .

Very truly yours,

The Clerk's Office

Dated: April 15, 2025

To: Jeffrey Michael Siegel, Esquire
Chase Hunter
Jonathan Levin, Esquire

Appeals Court Clerk's Office

Address: John Adams Courthouse
One Pemberton Square, Suite 1200
Boston, Massachusetts 02108-1705

Website: www.mass.gov/orgs/appeals-court

Phone: [\(617\) 921-4443](tel:(617)921-4443)

Appendix 11a
APPENDIX D

From: SJC Full Court Clerk
<SJCCommClerk@sjc.state.ma.us>
Sent: Thursday, April 17, 2025 6:01 PM
To: onelove@pandgmail.com
Subject: FAR-30243 - Notice: FAR denied

Supreme Judicial Court for the Commonwealth of
Massachusetts

Telephone

RE: Docket No. FAR-30243 IN THE MATTER OF
THE ESTATE OF DARLENE JOYCE CALABRESE

Hampden Probate & Family No. HD22P2394EA A.C.
No. 2023-P-1503

NOTICE OF DENIAL OF APPLICATION FOR
FURTHER APPELLATE REVIEW

Please take note that on April 17, 2025, the
application for further appellate review was denied.

Very truly yours,

The Clerk's Office

Dated: April 17, 2025

To: Jeffrey Michael Siegel, Esquire

Chase Hunter

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APPENDIX E

COMMONWEALTH OF MASSACHUSETTS
APPEALS COURT

23-P-1503

IN THE MATTER OF THE ESTATE OF
DARLENE JOYCE CALABRESE.

ORDER

Following our memorandum and order dated February 27, 2025, approving the request of Joanne Auclair for her appellate attorney's fees and costs of appeal against Chase Hunter, Auclair filed a motion for appellate attorney's fees of \$30,044.00, in accordance with the procedure set forth in *Fabre v. Walton*, 441 Mass. 9, 10-11 (2004). Supporting her motion was the affidavit of Attorney Jeffrey M. Siegel describing his law firm and the experience, hourly rate, actions taken, and time spent on the appeal by the attorneys and paralegal who worked on it. On March 12, 2025, Hunter filed a motion for enlargement of time to file a response to Auclair's motion for fees, which was granted until May 15, 2025. On May 16, 2025, Hunter filed a pleading that she has characterized, at least in part, as an opposition to Auclair's motion for fees.

"While the amount of a reasonable attorney's fee is largely discretionary, a judge should consider the nature of the case and the issues presented, the time and labor required, the amount of damages involved, the result obtained, the experience, reputation, and ability of the attorney, the usual price charged for similar services by other attorneys in the

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same area, and the amount of awards in similar cases. No one factor is determinative, and a factor-by-factor analysis, although helpful, is not required." *Twin Fires Inv., LLC v. Morgan Stanley Dean Witter & Co.*, 445 Mass. 411, 429 (2005) (citations and quotations omitted). In making such a determination, we "properly exercise[] independent judgment concerning the request's reasonableness." *Stowe v. Bologna*, 417 Mass. 199, 204 (1994). The assessment of fees based on the "lodestar" method, which involves "multiplying the number of hours reasonably spent on the case times a reasonable hourly rate," is permissible. See *Fontaine v. Ebtec Corp.*, 415 Mass. 309, 324 (1993). We are not obliged to "review and allow or disallow each individual item in the bill, but [may] consider the bill as a whole." *Berman v. Linnane*, 434 Mass. 301, 303 (2001). After reviewing Auclair's motion and supporting materials, the appellate briefs and the record, and considering the time expended, counsel's level of expertise and experience, the difficulty of the case, and the fees customarily charged for similar work, we conclude that attorney's fees of \$30,044.00 are fair and reasonable.

Accordingly, we award Auclair attorney's fees of \$30,044.00. Any proceedings to enforce this award shall be commenced in the Probate and Family Court. So ordered.

By the Court (Vuono,
Brennan & D'Angelo, JJ.¹),

¹ The panelists are listed in order of seniority.

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A handwritten signature in cursive script that reads "Sean Connolly". The signature is written in black ink and is positioned above the printed name.

Assistant Clerk

Entered: May 22, 2025.

Appendix 15a
APPENDIX F

From: Appeals Court Clerk's Office
<AppealsCtClerk@appct.state.ma.us>
Sent: Tuesday, June 10, 2025 10:07 AM
To: onelove@pandgmail.com
Subject: 2023-P-1503 - Notice of Order

**COMMONWEALTH OF MASSACHUSETTS
APPEALS COURT CLERK'S OFFICE**

RE: No. 2023-P-1503

Lower Court No. HD22P2394EA

In the matter of : Calabrese, Darlene Joyce

NOTICE OF DOCKET ENTRY

Please take note that, with respect to the Motion to Reconsider 5/22/25 Order filed by Chase Hunter. (Paper #74), on June 10, 2025, the following entry was made on the docket:

RE#74: This case is closed. No action will be taken by the court on this or any future filing in this matter. (Vuono, D'Angelo, Brennan, JJ.) *Notice.

**IMPORTANT INFORMATION ABOUT
ELECTRONICALLY FILING IN THE APPEALS
COURT**

- Every attorney with an appeal pending in the Appeals Court must have an account with eFileMA.com. Registration with eFileMA.com constitutes consent to receive electronic notification from the Appeals Court and e-service of documents. Self-represented litigants are encouraged, but not required, to register for electronic filing.
- All documents may, and some must, be electronically filed with the Appeals Court using

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eFileMA.com. No paper original or copy of any e-filed document is required.

- E-filing impounded documents or e-filing by self-represented litigants is voluntary.
- Additional information is located on our Electronic Filing web page:
<https://www.mass.gov/guides/electronic-filing-at-the-appeals-court>.
- Appeals Court forms, including some in multiple languages, are available at:
<https://www.mass.gov/lists/appeals-court-forms> .

Very truly yours,
The Clerk's Office

Dated: June 10, 2025

To: Jeffrey Michael Siegel, Esquire
Chase Hunter
Jonathan Levin, Esquire

Appeals Court Clerk's Office

Address: John Adams Courthouse
One Pemberton Square, Suite 1200
Boston, Massachusetts 02108-1705

Website: www.mass.gov/orgs/appeals-court

Phone: [\(617\) 921-4443](tel:(617)921-4443)

Appendix 17a
APPENDIX G

From: SJC Full Court Clerk
<SJCCommClerk@sjc.state.ma.us>
Sent: Friday, July 25, 2025 4:00 PM
To: onelove@pandgmail.com
Subject: FAR-30243B - Notice: FAR denied

Supreme Judicial Court for the Commonwealth of
Massachusetts

Telephone

RE: Docket No. FAR-30243B

IN THE MATTER OF THE ESTATE OF DARLENE
JOYCE CALABRESE

Hampden Probate & Family No. HD22P2394EA A.C.
No. 2023-P-1503

NOTICE OF DENIAL OF APPLICATION FOR
FURTHER APPELLATE REVIEW

Please take note that on July 25, 2025, the
application for further appellate review was denied.

Very truly yours,
The Clerk's Office

Dated: July 25, 2025
To: Jeffrey Michael Siegel, Esquire
Chase Hunter
Jonathan Levin, Esquire

Appendix 18a
APPENDIX H

From: SJC Full Court Clerk
<SJCCommClerk@sjc.state.ma.us>
Sent: Thursday, October 16, 2025 10:00AM
To: onelove@pandgmail.com
Subject: FAR-30243B - Notice of Docket Entry

Supreme Judicial Court for the Commonwealth of
Massachusetts

RE: No. FAR-30243B

IN THE MATTER OF THE ESTATE OF DARLENE
JOYCE CALABRESE

NOTICE OF DOCKET ENTRY

Please take note that the the following entry was
made on the docket. Motion to reconsider denial of
FAR application filed by Chase Hunter. (10/26/2025
The motion is denied).

Very truly yours,
The Clerk's Office

Dated: October 16, 2025
To: Jeffrey Michael Siegel, Esquire
Chase Hunter
Jonathan Levin, Esquire

Appendix 19a
APPENDIX I

**General Law Part II, Title II. Chapter 190B, Section
1-201(24)**

"Interested person", includes heirs, devisees, children, spouses, creditors, beneficiaries, and any others having a property right in or claims against a trust estate or the estate of a decedent, ward, or protected person. It also includes persons having priority for appointment as personal representative, and other fiduciaries representing interested persons. The meaning as it relates to particular persons may vary from time to time and shall be determined according to the particular purposes of, and matter involved in, any proceeding.

**General Law Part II, Title II. Chapter 190B,
Section § 3-614;**

A special personal representative may be appointed in a proceeding by order of the court on the petition of any interested person and finding, after notice and hearing, that appointment is necessary to preserve the estate or to secure its proper administration including its administration in circumstances where a general personal representative cannot or should not act. If it appears to the court that an emergency exists, appointment may be ordered without notice. A special personal representative shall continue to act during appeal of his appointment unless the court orders otherwise.

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General Law Part III, Title I, Chapter 211A, § 15

If, upon the hearing of an appeal or exceptions in any proceeding, it appears that the appeal or exceptions are frivolous, immaterial or intended for delay, the appeals court may, either upon motion of a party or on its own motion, award against the appellant or excepting party double costs from the time when the appeal was taken or the exceptions were allowed, and also interest from the same time at the rate of twelve per cent a year on any amount which has been found due for debt and damages, or which he has been ordered to pay, or for which judgment has been recovered against him, or may award any part of such additional costs and interest.

General Law Part III, Title I, Chapter 215, § 10

The procedure upon an appeal from an order, decree or denial of a probate court shall be in accordance with the Massachusetts Rules of Appellate Procedure.

General Law Part III, Title II, Chapter 231, § 118, first paragraph;

A party aggrieved by an interlocutory order of a trial court justice in the superior court department, the housing court department, the land court department, the juvenile court department or the probate and family court department may file, within thirty days of the entry of such order, a petition in the appropriate appellate court seeking relief from such order. A single justice of the appellate court may, in his discretion, grant the same relief as an appellate court is authorized to grant pending an appeal under section one hundred and seventeen. If the petition is

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filed with respect to a discovery order and is denied, the single justice may, after such hearing as the single justice in his discretion deems appropriate, require the petitioning party or the attorney advising the petition or both of them to pay to the party who opposed the petition the reasonable expenses incurred in opposing the petition, including attorney's fees, unless the court finds that the filing of the petition was substantially justified or that other circumstances make an award of expenses unjust.

General Law Part III, Title II, Chapter 231, § 118, second paragraph:

A party aggrieved by an interlocutory order of a trial court justice in the superior court department, the housing court department, the land court department or the probate and family court department, granting, continuing, modifying, refusing or dissolving a preliminary injunction, or refusing to dissolve a preliminary injunction, or a party aggrieved by an interlocutory order of a single justice of the appellate court granting a petition for relief from such an order, may appeal therefrom to the appeals court or, subject to the provisions of section ten of chapter two hundred and eleven A, to the supreme judicial court, which shall affirm, modify, vacate, set aside, reverse the order or remand the cause and direct the entry of such appropriate order as may be just under the circumstances. An appeal under this paragraph shall be taken within thirty days of the date of the entry of the interlocutory order and in accordance with the Massachusetts rules of appellate procedure. Pursuant to action taken by the appellate court the cause shall be remanded to the trial court for further proceedings.

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APPENDIX J

Massachusetts Rule of Civil Procedure 1 (relevant part only) as amended, 474 Mass. 1402 (2016)

These rules govern the procedure before a single justice of the Supreme Judicial Court or of the Appeals Court, and in the following departments of the Trial Court...

Massachusetts Rule of Appellate Procedure 1(a) as appearing in 481 Mass. 1601 (2019) and 1(c) as amended, 487 Mass. 1601 (2021)

a) These rules govern procedure in appeals to an appellate court. They shall be construed, administered, and employed to secure the just, speedy, and inexpensive determination of appeals. They shall be construed in conjunction with the rules and standing orders of the appellate courts.

c) “appellate court” means the full Supreme Judicial Court, the full Appeals Court, or a statutory quorum of either, as the case may be, whichever court is exercising jurisdiction over the case at bar.

Massachusetts Rule of Appellate Proc. 4(a)(1)(A) as appearing in 481 Mass. 1606 (2019)

(a) Appeals in civil cases

(1) Time for filing a notice of appeal

(A) Generally

In a civil case, unless otherwise provided by statute, the notice of appeal required by Rule 3 shall be filed with the clerk of the lower court

(i) within 30 days of the date of the entry of the

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judgment, decree, appealable order, or adjudication appealed from; but

- (ii) if the Commonwealth or an officer or agency thereof is a party, the notice of appeal may be filed by any party within 60 days of such entry, except
- (iii) in child welfare cases, in which the notice of appeal shall be filed within 30 days from the date of the entry of the judgment, decree, appealable order, or adjudication.

**Massachusetts Rule of Appellate Procedure 25
as appearing in 481 Mass. 1654 (2019)**

If an appellate court determines that an appeal in a civil case is frivolous, it may award just damages and single or double costs to the appellee, and such interest on the amount of the judgment as may be allowed by law. The appellate court shall calculate the amount of any award after a separately filed motion or notice from the court and reasonable opportunity to respond.

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APPENDIX K

[STATE CIVIL DOCKETING STATEMENT FORM
EXCERPT]

5. Perfection of Appeal

a. Is the appeal from a final judgment, i.e., judgment disposing of all parties and claims?

[PETITIONER'S ANSWER]

No

[STATE CIVIL DOCKETING STATEMENT FORM
EXCERPT]

5. Perfection of Appeal

b. If no, identify the basis on which the interlocutory order is immediately appealable.

[PETITIONER'S ANSWER]

Present execution; c 231 s 118 par. 2; c 190B s 3-614

[STATE CIVIL DOCKETING STATEMENT FORM
EXCERPT]

6. Appellate Issues.

In cases other than child welfare appeals, please provide a short statement of the anticipated issues on appeal. If the appellate issue involves the interpretation of a particular statute or regulation, please provide a citation to that statute or regulation. (Note: This statement is for informational purposes only and failure to raise an issue here will not preclude an appellant from raising the issue in its brief.):

Appendix 25a

[PETITIONER'S ANSWER]

To determine timeliness of motions for reconsideration, it is important to understand that the Trial Court entered a "gatekeeper" order on 4/7/23 that, inter alia, required parties to request permission via email to file documents. Subsequently, the trial court established a timeliness rule -- which was communicated by email -- that a motion was timely filed if permission requested to file a motion was timely received. And the clock to determine timeliness for filing was based on the date the request for permission to file was allowed by the trial court (via email) -- and this extended the deadline for filing. 1) Denied motions to dissolve a preliminary injunction (c 231 s 118 para 2) 2) Denied motions to disqualify counsel/motion for evidentiary hearing of such (pres. execution) 3) Sua sponte, no-notice appointment Spec. Pers. Rep; Mass. G.L. c 190B § 3-614; present execution, Lynde v. Vose, 96 NE 2d. 4) Sua sponte, no-notice Orders entered on 12/26/23 -- while Motion to Recuse is pending - was filed 11/27/23.

**SUPPLEMENT TO CIVIL DOCKET
INFORMATION**

This supplement provides details that won't fit on the Court's version of the Civil Docketing Statement.

Civil Docketing Statement Section:

5(c) Docketing Date of Judgment or Interlocutory Order Appealed combined with 5(d) Date Notice of Appeal Filed:

Appendix 26a

1. Order 158 denied motion to reconsider of Order 135. Order 135 Denied Motion to Disqualify Counsel combined with Motion for Evidentiary Hearing.

Docketed: 10/2/2023

Notice of Appeal Filed: 10/24/2023

2. Order 159 denied motion to reconsider of Order 136. Order 136 Denied Motion for Evidentiary Hearing for Motion to Disqualify Counsel.

Docketed: 10/2/2023

Notice of Appeal Filed: 10/24/2023

3. Order 135 (Denied Motion to Disqualify Counsel combined with Motion for Evidentiary Hearing).

Docketed: 8/23/2023

The Notice of Appeal filed on 10/24/2023 showed only appeal of Order 159, but Order 159 denied a motion to reconsider Order 135. An Amended Notice of Appeal was filed on 12/4/2023 to show that Order 135 is the initial order appealed from.

Because of a “gatekeeper” Order entered on 4/7/2023, the parties were blocked from filing without first requesting Court permission by email. The Court later established by email that the deadline for filing was determined by the date upon which the party was granted permission to file.

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Requested Permission to File Motion to
Reconsider: 8/29/2023

Permission Granted: 8/30/2023
Motion to Reconsider Served: 9/11/2023 at Doc
142

4. Order 136 (Denied Motion for Evidentiary
Hearing on Motion to Disqualify Counsel).

Docketed: 08/23/2023

The Notice of Appeal filed 10/24/2023 showed only
appeal of Order 158, but Order 158 denied a
motion to reconsider Order 136. An Amended
Notice of Appeal was filed on 12/4/2023 to show
that Order 136 is the initial order appealed from.

Because of a “gatekeeper” order entered on
4/7/2023, the parties were blocked from filing
without first requesting Court permission by
email. The Court later established by email that
the deadline for filing was determined by the date
upon which the party was granted permission to
file.

Appellant requested Permission to File Motion to
Reconsider: 8/29/2023

Permission Granted: 8/30/2023
Motion to Reconsider Served: 9/11/2023 at Doc
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5. Order 153 (sua sponte, no-notice Special Personal Representative appointed. It appears to have been voided and replaced with Order at Doc 169.)

Docketed: 9/29/2023

Notice of Appeal filed: 10/24/2023

6. Order 160 (Denied Request at Doc 143 to dissolve Preliminary Injunction dated 4/7/23 due to change in circumstances ** Take notice that this was a three-document motion at Doc 143 and the judge's Assistant Judicial Case Manager ("AJCM") permitted only the filing of the first of multiple documents – the other two documents that were blocked for filing were a Statement of Facts and Memorandum of Law. Appellant was forced to file this request to dissolve a preliminary injunction pursuant Standing Order 2-99 which limits the length to five pages at Doc 144):

Docketed: 10/2/2023

Notice of Appeal filed: 10/24/2023

7. Order 161 (Denied Request at Doc 144 to dissolve Preliminary Injunction dated 4/7/23 due to change in circumstances ** Take notice of paragraph one (1) of the motion at Doc 144 which states that the Appellant was forced by the AJCM to classify this request as a 60(b) motion when it

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is not. Appellant's attempt to file this motion was rejected about three (3) times by the AJCM and was finally approved only after Appellant met the AJCM's terms.):

Docketed: 10/2/2023

Notice of Appeal Filed: 10/24/2023

8. Order 169 (sua sponte, no-notice Special Personal Representative appointed. This appears to be a correction to Order at Doc 153. This Order was extended on 12/26/23 by Order at Doc 201)

Docketed: 10/11/2023

Notice of Appeal Filed: 10/24/2023

9. Order Received by Email (Denied request to dissolve Preliminary Injunction due to change in circumstances):

Received: 10/11/2023

Notice of Appeal Filed: 10/24/2023

10. Order 179 (Denied request to dissolve Preliminary Injunction due to change in circumstances; Denied request at Doc 171 to file substantive motions that were suspended by the Preliminary Injunction dated 4/7/23):

Docketed: 10/31/2023

Notice of Appeal Filed: 11/20/2023

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Respectfully submitted,

/s/ Chase Hunter

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