

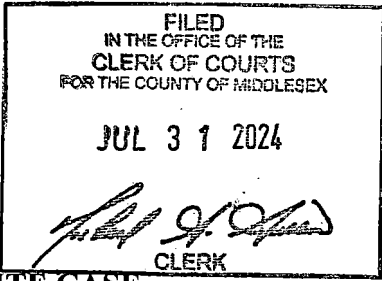
COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS.

SUPERIOR CIVIL COURT DEPARTMENT

_____)
 OpenCommonwealth (Bruce Friedman, D.B.A.)
 OpenCommonwealth.org),)
 Plaintiff,)
)
 v.)
)
 Maria Luise, Ronald Hogan and Deborah Burke,)
 as Individuals and The Malden)
 Community Fund, Inc.)
 Defendants,)
 _____)

CIVIL ACTION NO. 24CV2011



PLAINTIFF'S MOTION TO EXPEDITE CASE

Plaintiff OpenCommonwealth of Malden, MA ("Plaintiff") moves in accord with Massachusetts G.L c. 66 § 10A (d) (iii) to expedite the proceedings and also change the case track from average track (Track "A") to Accelerated (Track "X") or Fast (Track "F"). This case is about obtaining public records requested under the General Laws of Massachusetts ("G.L.") at Chapter. 66.

For the reasons set forth herein and under the Massachusetts public records law, Plaintiff Friedman pray this Honorable Court expedite this case and in addition, change its case track to "X" or "F".

Respectfully Submitted by Plaintiff

July 30th, 2024

/s/ Bruce Friedman
 Bruce Friedman – Pro-Se
 D.B.A. OpenCommonwealth.org
 8 Marvin Street
 Malden, MA. 02148
 (617) 952-3183
 info@opencommonwealth.org

COMMONWEALTH OF MASSACHUSETTS

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 Maria Luise, Ronald Hogan and Deborah Burke,)
 as Individuals and The Malden)
 Community Fund, Inc.)
 Defendants,)
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CIVIL ACTION NO. _____

PLAINTIFF’S NOTICE OF DEPOSITION DUCES TECUM

Plaintiff OpenCommonwealth of Malden, MA (“Plaintiff”) hereby notifies The Defendants of a recorded audiovisual deposition, duces tecum:

- DEPONENT: Maria Luise, Director and President, Malden Community Fund, Inc.
- DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.
- LOCATION: To be determined.

Plaintiff will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Plaintiff prefers the recorded audiovisual deposition be taken remotely. Plaintiff is open to arranging a date and time that is most compatible with the Defendants and the Deponents schedules.

Pursuant to the Massachusetts Civil Procedure Rule 34, Plaintiff provides notice of subpoena duces tecum upon the Deponent seeking the following materials as designated for production at or before the recorded audiovisual deposition.

DOCUMENT PRODUCTION NO.1: Please produce all of the following documents and records, including Electronically Stored Information (“ESI”):

1. The bylaws of the the Malden Community Fund, Inc. (MCFI”).
2. Any and all filings made with the Commonwealth of Massachusetts for the MCFI.
3. Any and all Internal Revenue Service (“IRS”) filings for the MCFI.
4. Any and all meeting notices for the MCFI.
5. Any and all meeting minutes for the MCFI.
6. Any EIN assigned to the MCFI by the IRS.
7. Any EIN assigned to the MCFI by the Commonwealth of Massachusetts.
8. A copy of any and all banking statements for any and all banking and/or savings and/or share and/or investment accounts of the MCFI.
9. A copy of any financial ledger(s) maintained for the MCFI.
10. A copy of any expenditures made by the MCFI.
11. A copy of any and all income to the MCFI.
12. A copy of any and all donations made to the MCFI.
13. A copy of any and all financial statements for the MCFI.
14. A roster of any stockholders of the MCFI.
15. A roster of any donors to the MCFI.
16. The structure of the board of directors of the MCFI.
17. The process for electing directors and Officers of the MCFI.
18. Any and all Meeting procedures for the MCFI.
19. Any and all Voting rights and procedures for the MCFI.
20. A copy of any and all payments made to any person for any purpose, including but not limited to salary, benefits, bonuses, expenses, reimbursements for the MCFI.

Respectfully Submitted by Plaintiff

July 30th, 2024

/S/ Bruce Friedman

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CIVIL ACTION NO. _____

PLAINTIFF’S NOTICE OF DEPOSITION DUCES TECUM

Plaintiff OpenCommonwealth of Malden, MA (“Plaintiff”) hereby notifies The Defendants of a recorded audiovisual deposition, duces tecum:

- DEPONENT: Gary Christenson, Mayor, The City of Malden.
- DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.
- LOCATION: To be determined.

Plaintiff will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Plaintiff prefers the recorded audiovisual deposition be taken remotely. Plaintiff is open to arranging a date and time that is most compatible with the Defendants and the Deponents schedules.

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Respectfully Submitted by Plaintiff

July 30th, 2024

/S/ Bruce Friedman

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CIVIL ACTION NO. _____

PLAINTIFF’S NOTICE OF DEPOSITION DUCES TECUM

Plaintiff OpenCommonwealth of Malden, MA (“Plaintiff”) hereby notifies The Defendants of a recorded audiovisual deposition, duces tecum:

- DEPONENT: Deborah Burke, Director and Treasurer, Malden Community Fund, Inc.
- DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.
- LOCATION: To be determined.

Plaintiff will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Plaintiff prefers the recorded audiovisual deposition be taken remotely. Plaintiff is open to arranging a date and time that is most compatible with the Defendants and the Deponents schedules.

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Respectfully Submitted by Plaintiff

July 30th, 2024

/S/ Bruce Friedman

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<hr/>)	

PLAINTIFF’S NOTICE OF DEPOSITION DUCES TECUM

Plaintiff OpenCommonwealth of Malden, MA (“Plaintiff”) hereby notifies The Defendants of a recorded audiovisual deposition, duces tecum:

DEPONENT: Charles Ranaghan, Controller, The City of Malden

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Plaintiff will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Plaintiff prefers the recorded audiovisual deposition be taken remotely. Plaintiff is open to arranging a date and time that is most compatible with the Defendants and the Deponents schedules.

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Respectfully Submitted by Plaintiff

July 30th, 2024

/S/ Bruce Friedman

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PLAINTIFF’S NOTICE OF DEPOSITION DUCES TECUM

Plaintiff OpenCommonwealth of Malden, MA (“Plaintiff”) hereby notifies The Defendants of a recorded audiovisual deposition, duces tecum:

DEPONENT: Gary Christenson, Mayor, The City of Malden.

DATE and TIME: To be determined; not before 30 days and not after 90 days from the date of this notice.

LOCATION: To be determined.

Plaintiff will arrange for the deposition to be taken by a certified audiovisual Court Reporter and officer/operator as defined under Massachusetts Civil Procedure Rule 28. Plaintiff prefers the recorded audiovisual deposition be taken remotely. Plaintiff is open to arranging a date and time that is most compatible with the Defendants and the Deponents schedules.

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July 30th, 2024

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