

**COMMONWEALTH OF MASSACHUSETTS
HAMPDEN SUPERIOR COURT**

BONITA JOYNER,

Plaintiff,

v.

BEHAVIORAL HEALTH NETWORK,
INC.,

Defendant.

Case No. 2079CV00629

**MOTION FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AGREEMENT**

Plaintiff Bonita Joyner, by counsel, pursuant to the Stipulation and Agreement of Settlement (the “Settlement”)¹ and Massachusetts Rule of Civil Procedure 23(c), hereby moves this Court for an order granting final approval to the Settlement. The Settlement is a fair, adequate, and reasonable compromise, and, after Court-approved notice, only one person out of the approximately 130,000 Settlement Class members has objected to the Settlement. In addition, although the Massachusetts IOLTA Committee submitted an objection, it objected only seeking to be named as the *cy pres* recipient for any undistributed settlement funds. The parties both agree that the Court can select the Massachusetts IOLTA Committee as the *cy pres* recipient, so that objection is moot. The Court should therefore grant final approval and enter judgment on the Settlement, so that the Settlement Class may receive the benefits of the Settlement, and so that this matter may be dismissed pursuant to the Settlement.

¹ The Settlement was previously filed on September 23, 2021, as **Exhibit 1** to the Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement.

This motion is supported by a memorandum of law, the Declaration of Gio Santiago Re: Notice Procedures, which is attached to this Motion as **Exhibit 1**, as well as by the Declaration of Lynn A. Toops, which was previously filed on September 23, 2021, as Exhibit 2 to the Unopposed Motion for Preliminary Approval of Class Action Settlement Agreement. In addition, the one objection to the Settlement is attached as **Exhibit 2**. Defendant does not oppose the relief requested in this motion, and no class member has objected.

Dated: November 30, 2021

Respectfully submitted,

/s/ Michael S. Appel

Michael S. Appel, BBO #543898
SUGARMAN, ROGERS, BARSHAK
& COHEN, P.C.
101 Merrimac Street, 9th Floor
Boston, MA 02114
Telephone: (617) 227-3030
appel@sugarmanrogers.com

Lynn A. Toops (admitted *pro hac vice*)
COHEN & MALAD, LLP
One Indiana Square, Suite 1400
Indianapolis, IN 46204
Telephone: (317) 636-6481
ltoops@cohenandmalad.com

J. Gerard Stranch, IV (admitted *pro hac vice*)
Peter J. Jannace (*pro hac vice* pending)
BRANSTETTER, STRANCH
& JENNINGS, PLLC
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203
Tel: (615) 254-8801
gerards@bsjfirm.com
peterj@bsjfirm.com

Samuel J. Strauss (*pro hac vice* pending)
TURKE & STRAUSS LLP
613 Williamson Street Suite 201
Madison, WI 53703
Telephone: (608) 237-1775
Facsimile: (608) 509-4423
Sam@tuckerstrauss.com

CERTIFICATE OF SERVICE

I, Michael S. Appel, hereby certify that I have on the above date served the foregoing by email and first-class mail, postage prepaid, to the following counsel of record:

James Monagle, Esquire
Mullen Coughlin, LLC
178 East Hanover Avenue, #103-373
Cedar Knolls, NJ 07927-2013

Lynda R. Jensen, Esquire
Mullen Coughlin, LLC
430 Franklin Village Drive, No. 184
Franklin, MA 02038

/s/ Michael S. Appel
Michael S. Appel, BBO #543898

EXHIBIT 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COMMONWEALTH OF MASSACHUSETTS
HAMPDEN SUPERIOR COURT

BONITA JOYNER,

Plaintiff,

vs.

BEHAVIORAL HEALTH NETWORK,
INC.,

Defendant.

Case No. 2079CV00629

CLASS ACTION

**DECLARATION OF GIO SANTIAGO RE:
NOTICE PROCEDURES**

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I, Gio Santiago, declare and state as follows:

1. I am a Senior Project Manager with KCC Class Action Services, LLC (“KCC”). Pursuant to the Preliminary Approval Order dated September 28, 2021, the Court appointed KCC as the Claims Administrator in connection with the proposed Settlement of the above-captioned Action.¹ I have personal knowledge of the matters stated herein and, if called upon, could and would testify thereto.

CLASS LIST

2. On October 14, 2021, KCC received from Defense Counsel a list of 133,237 persons identified as the Class List. On October 25, 2021, KCC received from Defense Counsel a list of 30 additional persons to add to the Class List. Combined, the Class List included names, addresses, primary and secondary group identification, and 2 variable text fields. KCC formatted the list for mailing purposes, removed duplicate records, and processed the names and addresses through the National Change of Address Database (“NCOA”) to update any addresses on file with the United States Postal Service (“USPS”). A total of 15,798 addresses were found and updated via NCOA. KCC updated its proprietary database with the Class List.

MAILING OF THE NOTICE PACKET

3. On October 28, 2021, KCC caused the Summary Notice (the “Postcard Notice”) to be printed and mailed to the 129,960 unique names and mailing addresses in the Class List. On October 28, 2021, KCC caused the Long Form Notice to be printed and mailed to the Massachusetts IOLTA Fund Committee. A true and correct copy of the Postcard Notice is attached hereto as Exhibit A. A true and correct copy of the Long Form Notice is attached hereto as Exhibit B.

4. Since mailing the Postcard Notice to the Class Members, KCC has received 426 Postcard Notices returned by the USPS with forwarding addresses. KCC immediately caused Postcard Notices to be re-mailed to the forwarding addresses supplied by the USPS.

5. Since mailing the Postcard Notices to the Class Members, KCC has received 2,415

¹ All capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Settlement Agreement and/or the Preliminary Approval Order.

1 Postcard Notices returned by the USPS with undeliverable addresses. Through credit bureau and/or
2 other public source databases, KCC performed address searches for these undeliverable Postcard
3 Notices and was able to find updated addresses for 1,429 Class Members. KCC re-mailed Postcard
4 Notices to the found new addresses.
5

6 **SETTLEMENT WEBSITE**

7 6. On or about October 28, 2021, KCC established a website
8 [www.behavioralhealthsettlement.com] dedicated to this matter to provide information to the Class
9 Members and to answer frequently asked questions. The website URL was set forth in the Long
10 Form Notice, Postcard Notice, and Claim Forms. Visitors of the website can download copies of
11 the Notice, Claim Form, and other case-related documents. Visitors can also submit claims online,
12 and, if applicable, upload supporting documentation. As of November 22, 2021, the website has
13 received 3,874 visits.
14

15 **TELEPHONE HOTLINE**

16 7. KCC established and continues to maintain a toll-free telephone number (1-855-
17 786-1039) for potential Class Members to call and obtain information about the Settlement, request
18 a Notice Packet, and/or seek assistance from a live operator during regular business hours. The
19 telephone hotline became operational on October 28, 2021. As of November 22, 2021, KCC has
20 received a total of 1,315 calls to the telephone hotline, of which 22 calls were handled by a live
21 operator.
22

23 **OBJECTIONS TO THE SETTLEMENT**

24 8. The deadline for Class Members to object to the settlement was November 29, 2021.
25 As of the date of this declaration, KCC has received no objections to the settlement.
26

27 I declare under penalty of perjury under the laws of the United States of America that the
28 foregoing is true and correct.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Executed on November 29, 2021 at Louisville, Kentucky.



Gio Santiago

EXHIBIT

A

Joyner v. Behavioral Health Network Settlement Administrator
P.O. Box 43416
Providence, RI 02940-3416

Summary Notice

*Joyner v. Behavioral Health
Network, Inc.*, 2079CV00629
(Hampden Cnty. Mass. Super. Ct.)

***You may be entitled to receive
benefits under this class action
Settlement.***

*A state court authorized this
Notice. It is **not** a solicitation from
a lawyer.*

<<Bar Code>>

Postal Service: Please do not mark barcode

BHO-«Claim8»-«CkDig»

Claim ID: <<Claim8>>

PIN: <<PIN>>

«Name4»

«FirstNAME» «LastNAME»

«Addr1» «Addr2»

«City», «State»«FProv» «Zip»«FZip»

«FCountry»

BHO

A proposed Settlement has been reached in a lawsuit entitled *Joyner v. Behavioral Health Network, Inc.*, No. 2079CV00629, pending in the Hampden County Massachusetts Superior Court. The lawsuit alleges that on or about May 26, 2020 to May 28, 2020, Behavioral Health Network, Inc. (BHN) was the victim of a cyberattack resulting in access by an unauthorized third party to certain computer systems of BHN containing personal information and protected health information stored by BHN, including names, Social Security numbers, dates of birth, medical history information, health insurance information, and other information (the "Data Security Incident"). BHN maintains that it had meritorious defenses, and it was prepared to vigorously defend the lawsuit. The Settlement is not an admission of wrongdoing or an indication that BHN has violated any laws, but rather the resolution of disputed claims. BHN encourages all persons who qualify as members of the Settlement Class to participate in the Settlement.

Who Is Included? BHN's records indicate you are included in the Settlement as a Settlement Class Member because your information may have been involved in the Data Security Incident.

What Benefits are Included in the Settlement?

- BHN has agreed to pay \$1,200,000 into a Settlement Fund to provide for Settlement Class Members to sign up, at no cost to the Settlement Class Member, for credit monitoring, and to provide for payments of valid claims for documented Economic Losses and Lost Time.
- All Settlement Class Members have the option to sign up for the Settlement Offering of credit monitoring, which will include identity theft insurance coverage with a limit of no less than \$1,000,000.
- Any Settlement Class Member may submit one or more claims for reimbursement for documented Economic Losses related to the Data Security Incident that have not been reimbursed by IDX or other third parties, up to an aggregate total of \$10,000 per Settlement Class Member, provided, however, that no Settlement Class Member may submit a Reimbursement Form unless said Settlement Class Member has first elected to receive and enrolled in the Settlement Offering, submitted a Reimbursement Claim to the vendor supplying the Settlement Offering, the vendor has denied the claim, and said Settlement Class Member has exhausted the vendor's claims process.
- In addition, any Settlement Class Member may submit one or more claims for reimbursement of Lost Time, up to an aggregate total of \$1,000. A Settlement Class Member may submit claims for Lost Time regardless of whether the Settlement Class Member enrolls in the Settlement Offering or has any claim for documented Economic Losses.
- If funds are insufficient to cover all claims, the claims will be reduced pro rata.

How Do I Receive Settlement Benefits? To receive the Settlement Offering, Settlement Class Members must submit an Election Form to the Settlement Administrator by January 26, 2022. To file a claim for reimbursement of Economic Losses, Settlement Class Members must first elect to receive and enroll in the Settlement Offering, submit a Reimbursement Claim to the vendor, receive a denial of the Reimbursement Claim from the vendor, exhaust the vendor's claims process, and submit a Reimbursement Form to the Settlement Administrator six months after the Settlement Offering is first instituted.

To receive reimbursement for Lost Time, Settlement Class Members must submit a Reimbursement Form to the Settlement Administrator six months after the Settlement Offering is first instituted.

All forms are available at www.behavioralhealthsettlement.com, by calling 1-855-786-1039, or by writing to the Settlement Administrator at *Joyner v. Behavioral Health Network* Settlement Administrator, P.O. Box 43416, Providence, RI 02940-3416. All forms may be submitted through the Settlement Website or by mail to the Settlement Administrator.

What Are My Options? You can do nothing, or you can submit an Election Form or a Reimbursement Form. Whether you do nothing or submit an Election or Reimbursement Form, your rights will be affected. You will not be able to sue BHN in a future lawsuit about the claims addressed in the Settlement. You can also object to the Settlement, Class Counsel's request for fees and expenses, or the Settlement Class Representative's request for a service award. ***All Objections must be postmarked by November 29, 2021.***

The Final Approval Hearing. The Court will hold a Final Approval Hearing at 2:00 p.m., on December 14, 2021, at the Hampden County Massachusetts Superior Court, 50 State St., Springfield, MA 01102. At the Final Approval Hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court may also consider Settlement Class Counsel's request for attorneys' fees of up to one-third of the Settlement Fund, plus reasonable expenses, and a service award of \$5,000 to the Settlement Class Representative that filed this lawsuit. If there are objections, the Court will consider them.

Getting More Information. More information, including the Settlement Agreement and other related documents, is available at www.behavioralhealthsettlement.com.

EXHIBIT

B

HAMPDEN COUNTY MASSACHUSETTS SUPERIOR COURT

Notice of Class Action and Proposed Settlement

You may be entitled to receive benefits under this class action Settlement.

This notice summarizes the proposed Settlement reached in a lawsuit entitled *Joyner v. Behavioral Health Network, Inc.*, No. 2079CV00629, pending in the Hampden County Massachusetts Superior Court (“Lawsuit”). For the precise terms and conditions of the Settlement, please see the Settlement Agreement available at www.behavioralhealthsettlement.com, or by contacting the Settlement Administrator at *Joyner v. Behavioral Health Network* Settlement Administrator, P.O. Box 43416, Providence, RI 02940-3416.

PLEASE DO NOT TELEPHONE THE COURT OR THE COURT CLERK’S OFFICE TO INQUIRE ABOUT THIS SETTLEMENT OR THE CLAIM PROCESS.

This notice may affect your rights—please read it carefully.

A state court authorized this Notice. This is not a solicitation from a lawyer.

- The lawsuit alleges that on or about May 26, 2020 to May 28, 2020, Behavioral Health Network, Inc. (BHN) was the victim of a cyberattack resulting in access by an unauthorized third party to certain computer systems of BHN containing personal information and protected health information stored by BHN, including names, Social Security numbers, dates of birth, medical history information, health insurance information, and other information (the “Data Security Incident”). BHN maintains that it had meritorious defenses, and it was prepared to vigorously defend the lawsuit. The Settlement is not an admission of wrongdoing or an indication that BHN has violated any laws.
- If your information was potentially compromised in the Data Security Incident, you are a Settlement Class Member.
- **The Settlement provides a \$1,200,000 Settlement Fund.**
- **Settlement Class Members are eligible for the Settlement Offering, which is credit monitoring and identity theft insurance, by submitting the Election Form postmarked by January 26, 2022 and following the additional enrollment instructions to activate the plan as instructed.**
- **The Settlement also provides that Settlement Class Members who elected to receive and enrolled in the Settlement Offering may also seek reimbursement of up to \$10,000 for documented Economic Losses Settlement Class Members suffered as a result of the Data Security Incident that have not been reimbursed. To be eligible for reimbursement, you must submit sufficient evidence of your economic loss and satisfy additional requirements. The deadline to submit a claim is six months after the Settlement Offering is first instituted.**
- **The Settlement also provides that Settlement Class Members may seek reimbursement for Lost Time related to the Data Security Incident. To be eligible for reimbursement, you must submit a claim showing the Lost Time is fairly traceable to the Data Security Incident. The deadline to submit a claim is six months after the Settlement Offering is first instituted.**

| YOUR LEGAL RIGHTS AND OPTIONS IN THIS SETTLEMENT | |
|--|--|
| SUBMIT AN ELECTION FORM DEADLINE: JANUARY 26, 2022 | This is the only way for Settlement Class Members to enroll in the Settlement Offering of credit monitoring and identity theft insurance paid for by BHN. |
| SUBMIT ONE OR MORE REIMBURSEMENT FORMS DEADLINE: SIX MONTHS AFTER THE SETTLEMENT OFFERING IS FIRST INSTITUTED | This is the only way for Settlement Class Members to request reimbursement of economic losses and lost time related to the Data Security Incident. For economic losses, you must elect to receive and enroll in the Settlement Offering offered through this Settlement to be eligible for reimbursement. For lost time, you do not need to enroll in the Settlement Offering. You can seek reimbursement for economic losses, for lost time, or for both. |
| DO NOTHING | If you are a Settlement Class Member and do not submit an Election Form or a Reimbursement Form, you will not receive anything from the Settlement, and you will not be able to sue, continue to sue, or be part of another lawsuit against BHN about the legal claims resolved by this Settlement. |
| OBJECT DEADLINE: NOVEMBER 29, 2021 | You may object to the Settlement or to Class Counsel’s or the Class Representative’s requests for Class Counsel fees or Service Awards, respectively. |
| GO TO A HEARING ON DECEMBER 14, 2021 | You may object to the Settlement and ask the Court for permission to speak at the Final Approval Hearing about your objection. |

- These rights and options—and the deadlines to exercise them—are explained in this Notice.
- The Court still must decide whether to approve the Settlement. No benefits will be provided, or payments made until after the Court grants final approval of the Settlement and all appeals, if any, are resolved.

QUESTIONS? READ ON AND VISIT WWW.BEHAVIORALHEALTHSETTLEMENT.COM

TABLE OF CONTENTS

| | PAGE |
|---|-------------|
| BASIC INFORMATION | 2 |
| • Why is this Notice being provided? | 2 |
| • What is this lawsuit about? | 3 |
| • Why is this a class action? | 3 |
| • Why is there a Settlement?..... | 3 |
| WHO IS IN THE SETTLEMENT | 3 |
| • How do I know if I am part of the Settlement? | 3 |
| • What if I am not sure whether I am included in the Settlement? | 3 |
| THE SETTLEMENT BENEFITS | 3 |
| • What benefits does the Settlement provide?..... | 3 |
| • Tell me more about enrollment in credit monitoring plan..... | 3 |
| • Tell me more about reimbursement of economic costs..... | 4 |
| • Tell me more about reimbursement of lost time..... | 4 |
| HOW TO GET SETTLEMENT BENEFITS | 4 |
| • How can I enroll in the credit monitoring and identity theft insurance plan? | 4 |
| • How do I obtain reimbursement of economic costs related to the Data Security Incident?..... | 4 |
| • How do I obtain reimbursement of lost time related to the Data Security Incident? | 5 |
| • When will I receive my reimbursement payment under the Settlement? | 5 |
| • What am I giving up as part of the Settlement? | 5 |
| THE LAWYERS REPRESENTING YOU | 5 |
| • Do I have a lawyer in the case?..... | 5 |
| • How will the lawyers be paid? | 5 |
| OBJECTING TO THE SETTLEMENT | 5 |
| • How do I tell the Court if I do not like the Settlement? | 5 |
| FINAL APPROVAL HEARING | 6 |
| • When and where will the Court decide whether to approve the Settlement? | 6 |
| • Do I have to come to the hearing?..... | 6 |
| • May I speak at the hearing?..... | 6 |
| IF YOU DO NOTHING | 6 |
| • What happens if I do nothing at all?..... | 6 |
| GETTING MORE INFORMATION | 6 |
| • How do I get more information about the proposed Settlement?..... | 6 |

BASIC INFORMATION

Why is this Notice being provided?

This Class Notice is provided pursuant to an order issued by the Court to inform you of the proposed Settlement and the Final Approval Hearing to be held by the Court to consider, among other things, (a) whether the Settlement is fair, reasonable and adequate and should be approved; and (b) Class Counsel’s request for Class Counsel Fees and Expenses and the Class Representative’s request for a Service Award. This Class Notice explains the nature of the lawsuit, the general terms of the proposed Settlement (including the benefits available), and your legal rights and obligations. This Class Notice is not an expression of any opinion by the Court as to the merits of the claims or defenses asserted in the Action.

The Hampden County Massachusetts Superior Court is overseeing this action, which is known as *Joyner v. Behavioral Health Network, Inc.*, 2079CV00629 (the “Action”). The person that filed the lawsuit is called the “Plaintiff.” Behavioral Health Network, Inc. is the “Defendant.”

What is this lawsuit about?

The lawsuit alleges that on or about May 26, 2020 to May 28, 2020, BHN was the victim of a cyberattack resulting in access by an unauthorized third party to certain computer systems of BHN containing personal information and protected health information stored by BHN, including names, Social Security numbers, dates of birth, medical history information, health insurance information, and other information (the “Data Security Incident”).

Plaintiff claims that BHN did not adequately protect personal information, and that as a result of the Data Security Incident people were harmed. BHN denies any wrongdoing, and no court or other entity has made any judgment or other determination of any wrongdoing or that any law has been violated.

Why is this a class action?

In a class action, one or more people called “Class Representatives” sue on behalf of themselves and other people with similar claims. The Plaintiff (the Class Representative here), together with the people she represents, are called “Settlement Class Members.” One court resolves the issues for all Settlement Class Members. In this case, the Class Representative is Bonita Joyner.

Why is there a Settlement?

The Court has not decided in favor of Plaintiff or BHN. Instead, both sides agreed to a settlement. Settlement avoids the costs and uncertainty of trial and related appeals while providing benefits to members of the Settlement Class. The Class Representative and attorneys for the Settlement Class (“Settlement Class Counsel”) believe the Settlement is in the best interests of the Settlement Class Members.

WHO IS IN THE SETTLEMENT

How do I know if I am part of the Settlement?

You are included in the Settlement Class if you are a member of the following:

All individuals to whom a notification was sent by or on behalf of Behavioral Health Network, Inc. regarding the Data Security Incident.

What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are in the Class, or have any other questions about the Settlement, call the toll-free number, 1-855-786-1039. You also may write with questions to: *Joyner v. Behavioral Health Network* Settlement Administrator, P.O. Box 43416, Providence, RI 02940-3416 or go to www.behavioralhealthsettlement.com.

THE SETTLEMENT BENEFITS

What benefits does the Settlement provide?

BHN will pay \$1,200,000 into a Settlement Fund, which, after deduction of Court-approved fees, awards, and expenses, will be used to pay the benefits of the Settlement.

The Settlement Fund will be used to provide Settlement Class Members the following benefits under the Settlement: (1) coverage under a credit monitoring and identity theft insurance plan, with coverage of at least \$1,000,000; and (2) reimbursement of documented Economic Losses up to \$10,000.00 per Settlement Class Member, which: (a) are related to the Data Security Incident; (b) have not otherwise been reimbursed; (c) are supported by required documentation; and (d) meet all requirements set forth in the Reimbursement Form and the Settlement Agreement. In addition, the Settlement Fund will be used to pay claims for lost time related to the Data Security Incident.

Complete details regarding the settlement benefits are available in the Settlement Agreement, which is available at www.behavioralhealthsettlement.com.

Tell me more about enrollment in the credit monitoring and identity theft insurance.

Settlement Class Members can enroll in the following credit monitoring and identity theft insurance of at least \$1,000,000:

Identity Theft Protection.

Settlement Class Members shall have the option, at no cost to them, to sign up for credit monitoring and identity theft insurance of at least \$1,000,000 offered by the Settlement (“Settlement Offering”). If a Settlement Class Member elects to

utilize the Settlement Offering, he or she must make that election by the Election Deadline. If a Settlement Class Member elects to receive the Settlement Offering, he or she must activate the plan in accordance with the instructions provided with the activation code that will be issued.

Tell me more about reimbursement of economic costs.

Reimbursement of Documented Economic Losses. Any Settlement Class Member may submit one or more Claims for reimbursement for documented Economic Losses related to the Data Security Incident that have not been reimbursed by the vendor providing the Settlement Offering or other third parties, up to an aggregate total of \$10,000 per Settlement Class Member. Reimbursement Claims must be submitted pursuant to the enclosed Economic Loss Reimbursement Form and in accordance with the reimbursement terms under the provisions of the Settlement Agreement. All Reimbursement Claims must be submitted to the Settlement Administrator on or before the expiration of the Claims Period.

Settlement Class Members who wish to make a timely and properly supported Claim for reimbursement of Economic Losses related to the Data Security Incident must provide to the Settlement Administrator the information required to evaluate the claim, including: (a) the Claimant's name and current address; (b) if applicable, a signed copy of IRS Form 14039 along with a statement under penalty of perjury that the form was submitted to the Internal Revenue Service; (c) the bills or invoices documenting the amount of the claim and proof that the bills or invoices were paid; and (d) a statement signed under penalty of perjury indicating that: (i) the Economic Losses claimed are fairly traceable to the Data Security Incident; and (ii) the total amount claimed has not been reimbursed by any other person or entity. Third-party documentation of Economic Losses is required to establish a claim. Economic Losses that are compensated under the Settlement Agreement are those that are reasonable and customarily incurred when responding to the type of fraud or identity theft suffered by the Settlement Class Member from the Data Security Incident.

Tell me more about reimbursement of lost time.

Reimbursement of Lost Time. Any Settlement Class Member may submit one or more claims for reimbursement for Lost Time related to the Data Security Incident, up to an aggregate total of \$1,000 per Settlement Class Member. A Settlement Class Member may submit a claim regardless of whether the Settlement Class Member takes advantage of the Settlement Offer and regardless of whether the Settlement Class Member submits a claim for documented Economic Losses. A Settlement Class Member is eligible for the payment provided in this section in addition to, and on top of, any payment for documented Economic Losses. A claim for reimbursement of Lost Time must be submitted pursuant to the enclosed Lost Time Reimbursement Form. Third-party documentation of Lost Time is not required to establish a claim, but you must provide a general description of how the time was spent and how many hours were spent.

HOW TO GET SETTLEMENT BENEFITS

How can I enroll in the credit monitoring and identity theft insurance plan?

To receive the Settlement Offering, Settlement Class Members must submit an Election Form by mail or through the Settlement Website by **January 26, 2022**. The Settlement Administrator will notify you of any deficiencies with respect to your Election Form, and you will have 21 days after such notice is sent to correct these deficiencies. The Settlement Administrator will then issue a final decision on your entitlement to the credit monitoring and identity theft insurance plan.

An Election Form is available at www.behavioralhealthsettlement.com or by calling 1-855-786-1039. Election Forms are also available by writing to the Settlement Administrator at *Joyner v. Behavioral Health Network* Settlement Administrator, P.O. Box 43416, Providence, RI 02940-3416.

How do I obtain reimbursement of economic costs related to the Data Security Incident?

For reimbursement of documented Economic Losses related to the Data Security Incident that have not been reimbursed, up to an aggregate total of \$10,000 in reimbursement per Settlement Class Member, you must read the instructions carefully, fill out the form completely, attach the required documentation, and either submit the form and documentation through the Settlement Website, or mail the form postmarked six months after the Settlement Offering is first instituted to:

Joyner v. Behavioral Health Network Settlement Administrator
P.O. Box 43416
Providence, RI 02940-3416

If you have questions about how to file a claim, call 1-855-786-1039 or go to www.behavioralhealthsettlement.com.

How do I obtain reimbursement of lost time related to the Data Security Incident?

For reimbursement of Lost Time related to the Data Security Incident, up to an aggregate total of \$1,000 in reimbursement per Settlement Class Member, you must complete and submit a Reimbursement Form(s) and provide a narrative of what the time was spent on. You can get the Reimbursement Form at www.behavioralhealthsettlement.com or by calling 1-855-786-1039. For each Reimbursement Form, you must read the instructions carefully, fill out the form completely, attach any required documentation, and either submit the form and documentation through the Settlement Website, or mail the form postmarked no later than six months after the Settlement Offering is first instituted to:

Joyner v. Behavioral Health Network Settlement Administrator
P.O. Box 43416
Providence, RI 02940-3416

If you have questions about how to file a claim, call 1-855-786-1039 or go to www.behavioralhealthsettlement.com.

When will I receive my reimbursement payment under the Settlement?

If you file a timely and valid Reimbursement Form and submit required documentation, the Settlement Administrator will evaluate your claim to confirm your eligibility and calculate your payment amount. The Settlement Administrator will notify you of any deficiencies with respect to your claim, and you will have 21 days after such notice is sent to correct these deficiencies. The Settlement Administrator will then issue a final decision on your claim.

Payments for valid claims will not be made until after the Settlement is finally approved and all appeals and other reviews have been exhausted.

What am I giving up as part of the Settlement?

If the Settlement is approved, you cannot sue BHN or be part of any lawsuit against BHN about any of the issues in this Action. All of the decisions by the Court will bind you. The specific claims you are giving up are described in Paragraph 9 of the Settlement Agreement. You will be releasing your claims against BHN and all related people as described in Paragraph 9.

The Settlement Agreement is available at www.behavioralhealthsettlement.com or by calling 1-855-786-1039. The Settlement Agreement describes the released claims with specific descriptions, so please read it carefully. If you have any questions about what this means, you can talk to Settlement Class Counsel, or you can talk to your own lawyer at your own expense.

THE LAWYERS REPRESENTING YOU

Do I have a lawyer in the case?

Yes, you do have a lawyer in the case. The Court appointed the law firms of Cohen & Malad, LLP, Branstetter, Stranch, & Jennings, PLLC, and Turke & Strauss LLP, to represent you and the Settlement Class. These firms are called "Settlement Class Counsel." You will not be charged by these lawyers for their work on this case. If you want to be represented by your own lawyer, you may hire one at your own expense.

How will the lawyers be paid?

Class Counsel will ask the Court for BHN to pay for reasonable attorneys' fees of up to one-third (\$400,000) of the Settlement Fund, plus reasonable litigation expenses, and a Class Representative service award not to exceed \$5,000. The Court will decide the amount of attorneys' fees, expenses, and service awards. Any attorneys' fees, expenses, and service awards approved will be paid from the Settlement Fund.

OBJECTING TO THE SETTLEMENT

How do I tell the Court if I do not like the Settlement?

If you are a Settlement Class Member, you can object to or comment on the Settlement, Settlement Class Counsel's request for attorneys' fees and expenses, and/or the Settlement Class Representative's request for a service award. To object, you must state in writing that you object to the Settlement, and include the following information in your written objection:

1. The name of the Action;
2. Your full name, mailing address, telephone number, and email address;
3. A statement of the basis on which you claim to be a Settlement Class Member;
4. A written statement of all grounds for your objection, accompanied by any legal support for the objection, and any evidence you wish to introduce in support of the objection;

5. The identity of all counsel, if any, representing you, including any former or current counsel who may claim entitlement to compensation for any reason related to the objection to the Settlement or the Fee Application;
6. A statement confirming whether you intend to personally appear and/or testify at the Final Approval Hearing and the identification of any counsel representing you who intends to appear at the Final Approval Hearing;
7. A list of any persons who will be called to testify at the Final Approval Hearing in support of the objection; and
8. Your signature signed under oath and penalty of perjury or, if legally incapacitated, the signature of your duly-authorized representative (along with documentation setting forth such legal incapacitation and representation) (an attorney's signature is not sufficient).

Failure to include this information may be grounds for the Court to disregard your objection.

To submit an objection, send a letter to the Court either by: (a) mailing it to the Clerk of the Court, Hampden County Superior Court, 50 State St., Springfield, MA 01102, or; (b) filing the objection in person at the same location. Mailed objections must be filed or postmarked on or before the Objection Deadline, which is November 29, 2021.

FINAL APPROVAL HEARING

When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at 2:00 p.m., on December 14, 2021, at the Hampden County Superior Court, 50 State St., Springfield, MA 01102. At the Final Approval Hearing, the Court will consider whether the proposed Settlement is fair, reasonable, and adequate. The Court may also consider Class Counsel's request for attorneys' fees and expenses, and the service award. If there are objections, the Court will consider them. After the Final Approval Hearing, the Court will decide whether to approve the proposed Settlement and how much to award to Class Counsel as fees and expenses, and the service awards. You do not need to attend.

The Final Approval Hearing may be moved to a different date or time without additional notice, so if you wish to attend, it is recommended that you periodically check www.behavioralhealthsettlement.com to confirm the date of the Final Approval Hearing.

Do I have to come to the hearing?

You do not have to attend the hearing. Class Counsel will answer any questions the Court may have. However, you are welcome to attend the hearing at your own expense. If you submit a written objection, you do not have to come to the Final Approval Hearing to raise your objection. As long as you timely mailed your written objection, the Court will consider it. You also may pay your own lawyer to attend the Final Approval Hearing, but their attendance is not necessary.

May I speak at the hearing?

Yes, you may speak at the hearing. If you would like to do so, you must indicate your intent to personally appear and/or testify at the Final Approval Hearing, and identify any counsel representing you who intends to appear at the Final Approval Hearing, when providing written notice of your objection as noted above regarding how to object to the Settlement.

IF YOU DO NOTHING

What happens if I do nothing at all?

If you are a Settlement Class Member and you do nothing, you will be legally bound by the Settlement, but you will not receive the Settlement Offering, or reimbursement for Economic Losses and Lost Time related to the Data Security Incident. You will not be able to bring a lawsuit, continue a lawsuit, or be a part of any other lawsuit against BHN about the claims in this case.

If you would like to request benefits under the Settlement, you must follow the instructions described in the sections above.

GETTING MORE INFORMATION

How do I get more information about the proposed Settlement?

This Notice summarizes the proposed Settlement. More details are included in the Settlement Agreement. You can get a copy of the Settlement Agreement at www.behavioralhealthsettlement.com. You also may write with questions to the Settlement Administrator at *Joyner v. Behavioral Health Network* Settlement Administrator, P.O. Box 43416, Providence, RI 02940-3416. You can access Reimbursement and Election Forms and review additional documents on the Settlement Website. You can also request to receive Reimbursement and Election Forms, a copy of the Settlement Agreement, and a detailed Notice by mail by calling the toll-free number, 1-855-786-1039.

EXHIBIT 2

1
2 HAMPDEN COUNTY SUPERIOR COURT

3 SPRINGFIELD, MASSACHUSETTS

4 BONITA JOYNER

Case: 2079CV00629

5 Plaintiff,

6 **MOTION TO OBJECT TO CLASS**
7 **ACTION SETTLEMENT OFFER**

8 vs.

9 BEHAVIORAL HEALTH NETWORK,

10 Defendant

11
12 Victim, Jason Kapinos, a Settlement Class Member in the above-captioned matter, most certainly
13 objects to the class settlement offer and requires counsel. Victim, Jason Kapinos, intends to
14 appear on the 14th of December 2021. Mr. Shea represents victim for *Commonwealth of*
15 *Massachusetts versus Jason Kapinos*. And Mr. Canzano for *Bank of America versus Jason*
16 *Kapinos*. Julia Kapinos, victim's mother and Ernest Kapinos, victim's father could appear at the
17 hearing electronically if necessary as they are elderly and disabled. Refer to Claim ID#
18 10061990 and PIN 117544. Here is victim, Jason Kapinos', email to his show trial lawyer:
19
20

21 Mr. Shea. I don't want you as an attorney as you're not candid to the tribunal. **The**
22 **Executive Office of the Trial Courts for the State of Massachusetts and the**
23 **Administrative Office of the U.S. Courts already rigged Ghislaine Maxwell's**
24 **matters as well as Prince Andrew's matters alongside mine, likely to protect**
25 **Nathaniel Philip Rothschild and Jacob Rothschild, 4th Baron Rothschild**. Steve
26 Bannon's matters have apparently been rigged as well. This seems to be an upcoming
27 character assassination campaign against me. Nathaniel Philip Rothschild appears
28 involved in my matters. Refer to: <https://thefederalist.com/2021/11/12/why-special-counsel-john-durham-is-investigating-the-brookings-institution/> Also, refer to: Nat
Rothschild Loses 'Puppet Master' Libel Suit <https://www.businessinsider.com/nat-rothschild-loses-puppet-master-libel-suit-2012-2> Because you're a Soviet-era show trial
attorney who has already thrown my case for the benefit of Bibi Netanyahu, the former
MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 Prime Minister of Israel who was behind Tamerlan Tsarnaev's pre-meditated murder by
2 means of apparently a bone saw and likely as carried out by the NSO Group whom you
3 might as well work for since you have not done anything meaningful to expose the pre-
4 meditated murder that the City of Westfield, Massachusetts Police (as represented by
5 William J. O'Grady) were behind while Joe Biden was Vice President. Associate District
6 Attorney Tyler James Kennefick as well as Associate District Attorney Andrew Ott are
7 covering up for Tamerlan Tsarnaev's pre-meditated murder as a protection racket for
8 Seth McFarlane and his \$200 million dollar contract as one can see here
9 ([https://www.hollywoodreporter.com/tv/tv-news/seth-macfarlane-inks-200m-deal-
11 nbcuniversal-1260123/](https://www.hollywoodreporter.com/tv/tv-news/seth-macfarlane-inks-200m-deal-
10 nbcuniversal-1260123/)) from the 10th of January 2020. That's not just my opinion but
12 that of Thompson & Thompson who can be reached here: <https://tppclaw.com> **Judge
13 Groce has already seemed to have made up his mind, indicating that "We hurt
14 ourselves when we help others." However, "A bystander liability claim [from Jason
15 Kapinos] is a type of civil lawsuit in which a bystander [Jason Kapinos] who
16 witnessed an accident [Boston Hoax Bombings] has the right to hold a defendant [as
17 in the Beth Israel Deaconess Medical Center] liable for causing his or her injuries
18 [watching Tamerlan Tsarnaev be dismembered with a bone saw]." So, to the Beth
19 Israel Deaconess Medical Center, the "treatment" of Tamerlan Tsarnaev was the
20 execution, that is to say, a pre-meditated murder in the clinical setting per a torture
21 contract apparently with a bone saw, making Judge Groce a modern-era Nazi.
22 Judge Groce is beholden to the Israeli government, choosing to protect a foreign
23 government in lieu of the American public from foreign countries. Refer to Foreign
24 Agent Registrations Act: <https://www.justice.gov/nsd-fara> This makes sense because
25 Judge Groce is represented by Susan McCoy from Cooley Shriar, a Jewish-run law
26 firm. This case can be cited as a precedent against the Hampden County District
27 Attorney's Office who prefer protecting Police Officers like Westfield Police who
28 dismember American Muslims. Refer to this article from *Yahoo News*: 'She Should
Spend Time In Prison': Former DA Accused of 'Showing Favor' to the McMichaels
Awaits Her Day In Court on Charges Over Delayed Arrests In Ahmaud Arbery's Slaying
<https://news.yahoo.com/she-spend-time-prison-former-000000762.html> The prosecutor's
Office for Hampden County obviously showed preference for Westfield "Police" Officer
Kyle Murphy who joined the Force in August 2021, allowing his father to let the
Marathon hoax bombed in the year 2013, over me, Jason Kapinos, since his father did
such a great job at allowing Tamerlan Tsarnaev dismembered with apparently a bone saw
while working for the Westfield Police as represented by Parker & O'Grady. Refer to the
hospital lawyer for what Jeff Rense calls, "The Mossad No Mercy Hospital", publicly
bragging about how he can frame innocent patients for crimes and then murder patients
and get away with it thanks to Associate District Attorney Andrew Ott as well as thanks
to Associate District Attorney Tyler James Kennefick and Edward James Murphy along
with Kyle Murphy while Westfield Police are represented by William J. O'Grady from
Parker & O'Grady: [http://healthlawreporter.bbablogs.org/2014/01/08/bidmc-and-the-
boston-marathon-bombings/](http://healthlawreporter.bbablogs.org/2014/01/08/bidmc-and-the-
boston-marathon-bombings/) Moreover, your aim is to protect the crimes of The Roman
Catholic Church which is quite likely why this article was published on *LewRockwell*
around the same day as my status hearing:
https://www.lewrockwell.com/2021/11/no_author/a-catholic-return-in-the-third-**

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 [millennium/](#) Consider the nearly 1.4 billion Roman Catholics and the tens of billions of
2 dollars of the Roman Catholic Church all directed against one 19-year old teenager held
3 incommunicado whose older brother was publicly executed because of “Roman
4 Catholics” like Mark Wahlberg, Edward Murphy, and William J. O’Grady from Parker &
5 O’Grady. At least I, Jason Kapinos, try to take down these criminals while you, Mr. Shea,
6 sit on your hands, making a mockery of freedom since you provide no “Shay’s
7 Rebellion” just like Officer Carrington from the Westfield Police is a mockery of
8 Monticello. Refer to: Could an Apple lawsuit mean the end of Israeli cybercriminals
9 NSO? [https://www.middleeastmonitor.com/20211128-could-an-apple-lawsuit-mean-the-
10 end-of-israeli-cybercriminals-nso/](https://www.middleeastmonitor.com/20211128-could-an-apple-lawsuit-mean-the-end-of-israeli-cybercriminals-nso/) This is what should have happened to Westfield
11 “Police” Officer Kyle Murphy which I had sent to Verizon (vz.ccpa@verizon.com) as
12 sell as Santander at Santander’s Ethics Hotline (ethicsoffice@santander.us) . Rob Yozzo
13 from Santander had received that email of which Magistrate Nathan Byrnes was aware:

14 I demand Westfield Police Officer Kyle Murphy is sentenced to death for treason. The
15 Murphy Organized Crime Family back in January 2013 failed to stop the Boston Hoax
16 Bombings of the 15th of April 2013 ([https://www.goodreads.com/book/show/29010907-
17 and-nobody-died-in-boston-either](https://www.goodreads.com/book/show/29010907-and-nobody-died-in-boston-either)) and Kyle Murphy was rewarded with a job as a full-
18 time Police Officer in August 2021 ([https://thewestfieldnews.com/appointments-mark-
19 end-of-police-reserve-force/](https://thewestfieldnews.com/appointments-mark-end-of-police-reserve-force/)) after he became a Sheriff’s Officer for Hampden County
20 (<https://www.linkedin.com/in/kyle-murphy-156237167/>) as represented by Egan,
21 Flanagan, and Cohen (<https://www.eganflanagan.com/our-attorneys/thomas-e-day>) in
22 September 2019, that is to say, the same month that Jacob Lupton left ARAG for KPMG
23 (<https://uk.linkedin.com/in/jacob-lupton-129991121>) and my ARAG contract non-
24 renewed in April 2021 perhaps as a quid pro quo between Munich RE and Das Legal
25 Insurance so that Munich RE ([https://www.munichre.com/en/company/about-munich-
26 re/group-history/a-second-seismic-shift-munich-re-under-national-socialism-1933-
27 1945.html](https://www.munichre.com/en/company/about-munich-re/group-history/a-second-seismic-shift-munich-re-under-national-socialism-1933-1945.html)) could allow ARAG to receive Das Legal Insurance
28 ([https://www.insurancebusinessmag.com/ca/news/legal-expenses/arag-group-acquires-
legal-expenses-insurance-rival-das-legal-protection-249401.aspx](https://www.insurancebusinessmag.com/ca/news/legal-expenses/arag-group-acquires-legal-expenses-insurance-rival-das-legal-protection-249401.aspx)) at "bargain basement
prices" to borrow the parlance of Stefano from Days of Our Lives as represented by
Gibson, Dunn, and Crutcher for Comcast and Verizon. I suspect that Gibson Dunn
tortiously interfered with my ARAG contract to non-renew in Winter/Spring 2019:
<https://www.mass.gov/files/documents/2019/06/05/G2019-01%20%28Kapinos%29.pdf>
This video exposes the Boston Bombings as hoaxes: Bank of America versus Jason
Kapinos. Expert Witness. Doctor Fetzer.mp4 <https://vimeo.com/577344275>

29 The Murphy Organized Crime Family harbored a known fugitive from Justice, Benjamin
30 Netanyahu, on the 16th of August 2021 ([https://www.jweekly.com/2021/08/16/why-is-
31 bibi-in-san-francisco-looking-so-sad/](https://www.jweekly.com/2021/08/16/why-is-bibi-in-san-francisco-looking-so-sad/)) on Larry Ellison's nearly 98% privately owned
32 Island of Lanai ([https://www.cnbc.com/2017/11/14/see-lanai-the-hawaiian-island-larry-
33 ellison-bought-for-300-million.html](https://www.cnbc.com/2017/11/14/see-lanai-the-hawaiian-island-larry-ellison-bought-for-300-million.html)) at The Four Seasons Hotels and Resorts as owned
34 by the former CEO of Microsoft, Bill Gates through Cascade Investments
35 ([https://www.nytimes.com/2021/05/26/business/bill-gates-cascade-michael-
36 larson.html](https://www.nytimes.com/2021/05/26/business/bill-gates-cascade-michael-larson.html)) as well as Saudi Prince Al Waleed bin Talal Al Saud. Refer to:
37 Netanyahu’s Ultra-Luxurious Hawaii Vacation Is a Total Legal Sh*tstorm
38 <https://news.yahoo.com/netanyahu-ultra-luxurious-hawaii-vacation-160402767.html>

After I complained about this to Lynn Locker for Davis, Wright, and Tremaine, Bill

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 Gates took a controlling stake in The Four Seasons Hotels and Resorts:
2 <https://pursuitist.com/bill-gates-cascade-investment-takes-control-of-four-seasons-hotels>
3 Larry Ellison even went so far as to offer a job to Bibi Netanyahu;
4 [https://nypost.com/2021/09/14/netanyahu-reportedly-offered-lucrative-oracle-board-seat-](https://nypost.com/2021/09/14/netanyahu-reportedly-offered-lucrative-oracle-board-seat-by-ellison)
5 [by-ellison](https://nypost.com/2021/09/14/netanyahu-reportedly-offered-lucrative-oracle-board-seat-by-ellison) Mr. Canzano (<https://www.richardcanzanolaw.com>) is "of counsel" to me in
6 Bank of America versus Jason Kapinos before the Westfield District Court: 04/16/2021
7 Motion for Request for a 30 Day Extension to File Counterclaims Again Bank of
8 America's Campaigns of Financing International Terrorism Against Defendant Resulting
9 in the Extra-Judicial Torture and Summary Executions of Tamerlan Tsarvaev and
10 Ibragim Todahsev and Pending Judicial Murder of Dzhokhar Tsanaev filed by Jason
11 Kapinos-Defendant. 2144CV000007 Bank Of America, N.a. v. Kapinos, Jason. Mr. Shea
12 (<http://www.morisi-oconnell.com>) is of counsel to me for Commonwealth of
13 Massachusetts versus Jason Kapinos. This case can be cited as a precedent against The
14 Murphy Organized Crime Family: [https://www.france24.com/en/europe/20210907-](https://www.france24.com/en/europe/20210907-french-firm-lafarge-loses-bid-to-dismiss-crimes-against-humanity-case-in-syria)
15 [french-firm-lafarge-loses-bid-to-dismiss-crimes-against-humanity-case-in-syria](https://www.france24.com/en/europe/20210907-french-firm-lafarge-loses-bid-to-dismiss-crimes-against-humanity-case-in-syria) Verizon
16 stole *Zootopia*, worth billions of dollars over my wiretapped Verizon (413-562-7351) and
17 Comcast (413-642-3587) phone lines. Refer to vanity lenses plate of L43562 at 175
18 Prospect Street Extension and 7351RM1 at New Corner Variety Store in Westfield,
19 Massachusetts which form L43562-735RM1 for my Verizon phone number of 413-562-
20 7351. I suspect that Allen & Overy for Verizon ([https://www.allenoverly.com/en-](https://www.allenoverly.com/en-gb/global/news-and-insights/news/allen-and-overys-us-team-advises-deutsche-bank-in-dual-financings-with-verizon-communications-inc)
21 [gb/global/news-and-insights/news/allen-and-overys-us-team-advises-deutsche-bank-in-](https://www.allenoverly.com/en-gb/global/news-and-insights/news/allen-and-overys-us-team-advises-deutsche-bank-in-dual-financings-with-verizon-communications-inc)
22 [dual-financings-with-verizon-communications-inc](https://www.allenoverly.com/en-gb/global/news-and-insights/news/allen-and-overys-us-team-advises-deutsche-bank-in-dual-financings-with-verizon-communications-inc)) was carrying out economic
23 espionage [<https://www.fbi.gov/file-repository/economic-espionage-1.pdf/view>] against
24 me as to Verizon and Deutsche Bank within the week that Capital One Bank North
25 America versus Jason Kapinos was dismissed by Judges O'Grady and McKenna and
26 withdrawn by Rubin & Rothman (<https://www.rubinrothman.com>) out of Islandia,
27 New York for Capital One.

16 When it concerns Edward James Murphy's perjury to "Judge" O'Grady, it's reminiscent
17 of something that one would see from *The Simpsons*. Refer to the former Westfield
18 Police Officer Edward James Murphy's perjury in Docket #2044R0-0330 before Judge
19 John P. McKenna: "And the [cluster munition] monitor that he [Jason Kapinos] used at
20 the Marathon bombing. And he [Jason Kapinos] thought the FBI was after him and that
21 he was going to, you know, use those bombs and that kind of stuff." To borrow a quote
22 from *The Simpsons*, it might as well have been, "Judge Snyder, motion to declare a writ
23 of boys-will-be-boys." Because that's not how a real courtroom is run according to
24 Attorney Paul Moraski. There's evidence, and when "Judges" like O'Grady, McKenna,
25 Rota, and Groce don't care enough if at all about actual evidence and, especially
26 exculpatory evidence, in the absence of "the fruit of the poisonous tree" or "illegal search
27 and seizure" along with "parallel construction", then that means they're running a
28 protection racket, protecting Westfield Police Officer Michael McCabe who ran in the
Boston Marathon of the 15th of April 2013. And that would be for the benefit of Snyder's
of Hanover since Judge Groce as in Grocery Store (as he calls himself that) is represented
by Halloran & Sage who represent Price Chopper behind the lies of "Boston Strong". So,
this means Judge "Groce" as in "Grocery Store" might as well be selling human organs
on the black market for Price Chopper which chopped more than prices since both Judge
Groce and Price Chopper are represented by Halloran & Sage. Even JP Morgan Chase

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 Bank is represented by Halloran & Sage, making Judge Groce a human trafficking
2 operation for JP Morgan Chase who donated to “The One Fund” as one can see here:
3 [https://www.chambers-associate.com/where-to-start/commercial-awareness/regional-](https://www.chambers-associate.com/where-to-start/commercial-awareness/regional-insights/the-one-fund-following-the-boston-bombings)
4 [insights/the-one-fund-following-the-boston-bombings](https://www.chambers-associate.com/where-to-start/commercial-awareness/regional-insights/the-one-fund-following-the-boston-bombings) . “Judge” O’Grady has been
5 known to work alongside “Attorney” Susan Conlon Philips who represent the City of
6 Westfield Public Schools that are “Boston Strong”. So, in consideration of Tamerlan
7 Tsarnaev’s pre-meditated murder by means of a bone saw, Susan Conlon Philips again, to
8 borrow quotes from *The Simpsons*, “ate” more than just Tamerlan Tsarnaev’s shorts. And
9 as a fallout of Tamerlan Tsarnaev’s pre-meditated murder by means of apparently a bone
10 saw, NewsCorporation split on the 27th of June 2013, reminiscent as to how Tamerlan
11 Tsarnaev’s thoracic cavity was split open on the 19th of April 2013. “An Act Prohibiting
12 the Participation of Healthcare Professionals in the Torture and the Abuse of Prisoners”
13 deters what is already criminal, the harvesting of human organs by Egan, Flanagan, and
14 Cohen for the Sheriff’s Office of Hampden County, child-murdering human organ
15 harvesters.

16 I suspect that Verizon would run this campaign against me because Verizon is
17 underwritten by Deutsche Bank and Deutsche Bank is represented by Crevier & Ryan
18 who have been known to work alongside Paul C. Picknelly. Verizon is also owed by
19 Apollo Global Management. So, I suspect this concerns my matters:
20 [https://nypost.com/2021/11/18/leon-black-buys-posh-28m-london-home-where-henry-](https://nypost.com/2021/11/18/leon-black-buys-posh-28m-london-home-where-henry-ford-ii-lived/)
21 [ford-ii-lived/](https://nypost.com/2021/11/18/leon-black-buys-posh-28m-london-home-where-henry-ford-ii-lived/) I suspect Leon Black chose that mansion in reference to Tamerlan’s pre-
22 meditated murder by motor vehicle since Black was connected to Jeffrey Epstein:
23 [https://www.vanityfair.com/news/2021/10/billionaire-leon-black-is-being-investigated-](https://www.vanityfair.com/news/2021/10/billionaire-leon-black-is-being-investigated-by-the-manhattan-da)
24 [by-the-manhattan-da](https://www.vanityfair.com/news/2021/10/billionaire-leon-black-is-being-investigated-by-the-manhattan-da) Verizon is also represented by Allen & Overy who also represent
25 ARAG. Moreover, Allen & Overy represent not only ARAG but KPMG at the same
26 time, meaning that the needs of KPMG will be more important than that of ARAG
27 members like me, Jason Kapinos. I suspect that that financiers behind Verizon became
28 fed up with President Trump. Refer to: Trump dropped by biggest lender Deutsche Bank
for future business: NYT [https://www.reuters.com/article/us-usa-trump-deutsche-](https://www.reuters.com/article/us-usa-trump-deutsche-bank/trump-dropped-by-biggest-lender-deutsche-bank-for-future-business-nyt-idUSKBN29H0PM)
[bank/trump-dropped-by-biggest-lender-deutsche-bank-for-future-business-nyt-](https://www.reuters.com/article/us-usa-trump-deutsche-bank/trump-dropped-by-biggest-lender-deutsche-bank-for-future-business-nyt-idUSKBN29H0PM)
[idUSKBN29H0PM](https://www.reuters.com/article/us-usa-trump-deutsche-bank/trump-dropped-by-biggest-lender-deutsche-bank-for-future-business-nyt-idUSKBN29H0PM) Moreover, Kick Sullivan who represents Westfield “Police” Officer
Kyle Murphy left Crevier & Ryan for Lyon & Fitzpatrick who represent The Dowd
Agencies and while Lyon & Fitzpatrick represents the criminals at 76 Hawks Circle in
addition to Atlas Copco where my father, Ernest Kapinos, used to work which has been
converted into an Amazon Distribution Center. Refer to this criminal investigation into
Amazon: [https://www.pbs.org/newshour/economy/house-committee-threatens-amazon-](https://www.pbs.org/newshour/economy/house-committee-threatens-amazon-with-criminal-investigation-into-market-dominance)
[with-criminal-investigation-into-market-dominance](https://www.pbs.org/newshour/economy/house-committee-threatens-amazon-with-criminal-investigation-into-market-dominance) Notice how Amazon more than
happily burnt books that exculpated the two Tsarnaev brothers as one can see here:
[https://jamesfetzer.org/2019/06/nobody-died-at-sandy-hook-was-not-enough-amazon-](https://jamesfetzer.org/2019/06/nobody-died-at-sandy-hook-was-not-enough-amazon-com-bans-five-5-more-moon-rock-books)
[com-bans-five-5-more-moon-rock-books](https://jamesfetzer.org/2019/06/nobody-died-at-sandy-hook-was-not-enough-amazon-com-bans-five-5-more-moon-rock-books) Verizon would run this campaign against me
through Shatz Schwartz & Fentin PC since Verizon is represented by Shatz Schwartz &
Fentin PC and while Verizon is underwritten by Deutsche Bank, an actual Nazi Bank.
Refer to: Deutsche Bank’s Perilous Pursuit of Profit

1 From Nazi collaboration to money laundering, a new book chronicles the German bank's
2 "trail of destruction." [https://newrepublic.com/article/156605/deutsche-banks-perilous-](https://newrepublic.com/article/156605/deutsche-banks-perilous-pursuit-profit)
3 [pursuit-profit](https://newrepublic.com/article/156605/deutsche-banks-perilous-pursuit-profit) Notice how Amazon is more than content to be represented by actual Nazis,
4 Sullivan & Cromwell, and yet Jeff Bezos lectures the public about Nazis as if his other
5 attorneys, Gibson, Dunn, and Crutcher were not ones in consideration of what happened
6 to Tamerlan Tsarnaev.

7 Perhaps most alarmingly of all is how you, Mr. Shea, choose to protect my cousin,
8 Lorettajo Kapinos over me, Jason Kapinos. This should get you disbarred. For example,
9 Lorettajo Kapinos should face at least five life-time prison sentences for her involvement
10 in kidnapping with the intent to drug, extort money, and to extort labor because she
11 allowed a psychiatric section 12 to be abused once in January 2017 when she worked at
12 not just any hospital but of the thousands of hospitals across the United States of
13 America, Providence Behavioral Health Hospital as represented by Egan, Flanagan, and
14 Cohen. Moreover, of the thousands of hospitals that Lorettajo Kapinos could have left
15 for, she chose to go to Baystate Medical Center so that a psychiatric section 12 could be
16 abused twice in April 2020; once in September 2020; and once in May 2021 for the
17 benefit of Edward James Murphy who worked on the Westfield Police as represented by
18 Parker & O'Grady and the FBI's Joint Terrorism Task Force.

19 **You, Mr. Shea from Morisi & O'Connell, do absolutely nothing whatsoever**
20 **meaningful to keep me safe from Edward James Murphy. For example, Edward**
21 **James Murphy was involved with his close friend, Craig Charvat from 89 Hawks**
22 **Circle to cut down a tree to represent me, Jason Kapinos, an "undesirable", being**
23 **kidnapped and murdered while in police custody.** When I complain about this,
24 Associate District Attorney Andrew Ott considers this to be "borderline indirect criminal
25 harassment" and Edward Murphy the victim. So, Edward James Murphy can cut down
26 trees to represent humans being kidnapped and murdered, but when I complain about it
27 outside of Westfield Court Associates, LLC, it's considered to be "indirect criminal
28 harassment". My complaints outside of Westfield Court Associates, LLC like to the
Department of Public Utilities apparently resulted in Ghislaine Maxwell being arrested.
So, had I, Jason Kapinos, kept my complaints within the local court system to
Massachusetts, perhaps nothing would have happened to Ghislaine Maxwell. There is
apparently some sort of connection to Parker & O'Grady by means of Barclay's Bank to
Jeffrey Epstein and Ghislaine Maxwell. Refer to: Jes Staley reportedly exchanged 1,200
emails with Jeffrey Epstein in four years
[https://www.theguardian.com/business/2021/nov/12/jess-staley-ex-barclays-boss-emails-](https://www.theguardian.com/business/2021/nov/12/jess-staley-ex-barclays-boss-emails-jeffrey-epstein-reports)
[jeffrey-epstein-reports](https://www.theguardian.com/business/2021/nov/12/jess-staley-ex-barclays-boss-emails-jeffrey-epstein-reports) Perhaps the tip of the spear concerning Parker & O'Grady is
Barclay's Bank, Parker & O'Grady's private client because Nelson & Kennard performed
a soft pull on my credit within the same 24-hour period or so that Cleary Gottlieb Steen
& Hamilton LLP defrauded the US Supreme Court and "Attorney" Richard Sypek joined
the City of Westfield "Police" Commission to run a protection racket for the private
clients of Parker & O'Grady like Westfield "Police" Captain Michael McCabe.
Apparently, these criminals were expecting to receive protection by means of "Judge"
Flannery from Parker & O'Grady before the Hampden County Superior Court as well as

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 “Judge” McDonough before “Judge” McDonough before the Hampden County Superior
2 Court because private clients of Egan, Flanagan, and Cohen include Bank of America, a
3 corrupt bank which created the payment processing system of “The One Fund” on the
4 17th of April 2013 for the 264 or so crisis actors who feigned their injuries and their
5 deaths and Toronto Dominion Bank was behind the “Boston Strong” concert. The “toxic
6 mold” on the Hampden County Superior Court seems to be “Judge” McDonough:
7 [https://www.masslive.com/news/2021/09/dont-put-lipstick-on-a-pig-da-anthony-gulluni-
8 wont-send-staff-back-to-springfield-courthouse-after-mold-outbreak.html](https://www.masslive.com/news/2021/09/dont-put-lipstick-on-a-pig-da-anthony-gulluni-wont-send-staff-back-to-springfield-courthouse-after-mold-outbreak.html) And lipstick
9 should never be placed on the pigs known as Bacon & Wilson. However, as to Anthony
10 Gulluni, “Birds of a feather commit insurance fraud with Bulkley, Richardson, and
11 Gelinas and dismember Muslims by bone saw together”. Insurance fraud appears to run
12 in the Gulluni family. Refer to: [https://www.masslive.com/news/2019/08/joseph-gulluni-
13 jr-uncle-of-hampden-da-charged-with-attempted-murder-arson-and-insurance-fraud.html](https://www.masslive.com/news/2019/08/joseph-gulluni-jr-uncle-of-hampden-da-charged-with-attempted-murder-arson-and-insurance-fraud.html)
14 Refer to: Insuring Against Terrorism - TRIA and Private Insurance in the Wake of the
15 Boston Bombings [https://www.whiteandwilliams.com/resources-events-Insuring-
16 Against-Terrorism-TRIA-and-Private-Insurance-in-the-Wake-of-the-Boston-
17 Bombings.html](https://www.whiteandwilliams.com/resources-events-Insuring-Against-Terrorism-TRIA-and-Private-Insurance-in-the-Wake-of-the-Boston-Bombings.html) So, Anthony Gulluni supports the payout of about \$23 million through
18 insurance fraud as allowed by Foley Hoag for BlueCross BlueShield of Massachusetts
19 since it benefits the private clients of Foley Hoag like the “former” Massachusetts
20 Attorney General Martha Coakley as well as yet more private clients of Foley Hoag like
21 Hillary Clinton and Barack Obama.

22 Westfield Court Associates, LLC is just a front for Bacon & Wilson who represent
23 Behavioral Health Network. Moreover, Doctor Andrew Bourke is affiliated with
24 Behavioral Health Network as can be seen here: Program Director
25 Company Name. Behavioral Health Network [https://www.linkedin.com/in/andrew-
26 bourke-92626213/](https://www.linkedin.com/in/andrew-bourke-92626213/) So, Doctor Andrew Bourke was lying to me on the 29th of October
27 2021 that he was not affiliated with Behavioral Health Network. Thus, Behavioral Health
28 Network uses criminals like Doctor Andrew Bourke a “forensics” clinician so that
Behavioral Health Network can illegally incarcerate their legal, political, and financial
opponents for Edward James Murphy’s benefit as Edward James Murphy is represented
by Gary F. Bevilacqua for Bacon & Wilson. So, Edward James Murphy can perjure
himself to Judges and get away with it because he is protected by both Bacon & Wilson
and Parker & O’Grady while the “Judge”, Groce, is represented by Cooley Shriar. That’s
also how Parker & O’Grady as well as Bacon & Wilson can allow terrorist attacks for
Edward Murphy’s benefit and get away with it. Edward Murphy’s protection racket
continues on before the Hampden County Superior Court by means of “Judge” Flannery,
“formerly” of Parker & O’Grady who “used to” work for the District Attorney’s Office
for Hampden County, meaning that these criminal commit crimes like allowing hoax
bombings, search for “suitable” candidates in the community to frame, and then
incarcerate them.

26 This is obviously a protection racket for Edward James Murphy. Of the 344 or so
27 available candidates across the State of Massachusetts who could have been a full time
28 “police” officer on the Westfield “Police” Force, it “had” to have been Kyle Murphy, the

1 son of Edward James Murphy who allowed the Boston Hoax Bombings in the year 2013.
2 The criminals who were behind setting up the noose from the telephone pole were
3 Edward James Murphy and Kyle Murphy concerning 167 Prospect Street Extension. Of
4 all the “Judges” who could have overheard, *Edward James Murphy* versus *Jason*
5 *Kapinos*, it “had” to have been William J. O’Grady from Parker & O’Grady who
6 represent the City of Westfield Police Department as well as Westfield Police Captain
7 Michael McCabe in his private capacity and while William J. O’Grady worked on the
8 City of Westfield “Law “Department, and, of course, William J. O’Grady worked on not
9 and of the 61 other District Courts across the State of Massachusetts but the Westfield
10 District Court. Refer to Operation Greylord: [https://www.fbi.gov/history/famous-](https://www.fbi.gov/history/famous-cases/operation-greylord)
11 [cases/operation-greylord](https://www.fbi.gov/history/famous-cases/operation-greylord) Of the thousands of Universities or colleges across the United
12 States of America that Kyle Murphy could have attended and graduated from, it “had” to
13 have been Westfield State University. There are 3,006 counties in the United States of
14 America. Kyle Murphy could have worked at the Sheriff’s Offices of one of the 3,005
15 other counties in the United States of America. However, it had to have, of course, been
16 the Sheriff’s Office for Hampden County, that is to say, the Sheriff’s Officers who
17 allowed the Boston Hoax Bombings of the 15th of April 2013. So, in a nutshell:

- 18 (1) 344 other police officers could have selected for the Westfield Police Force
- 19 (2) 162 other District Court Judges could have overheard *Edward James Murphy* versus
20 *Jason Kapinos*
- 21 (3) William J. O’Grady could have been a Chief Justice on 61 other District Courts other
22 than Westfield, Massachusetts
- 23 (4) Kyle Murphy could have graduated from 3,981 other degree-granting postsecondary
24 institutions in the U.S. than Westfield District University
- 25 (5) Kyle Murphy could have worked at 3,005 other Sheriff’s Offices than the one for
26 Hampden County as represented by Egan, Flanagan, and Cohen, the criminals who
27 allowed the Boston Hoax Bombings of the 15th of April 2013.
- 28 (6) These heinous instances of public corruption are allowed by the Executive Office of
the Trial Courts for the State of Massachusetts that can be reached here:
<https://www.mass.gov/orgs/executive-office-of-the-trial-court>
- (7) Since William J. O’Grady represents the City of Westfield, Massachusetts itself as
well as the City of Westfield, Massachusetts Police as well as Westfield Police
Captain Michael McCabe, it should have been self-evident that I never intended,
attempted, or actually built any bombs that were used at the Boston Marathon of the
15th of April 2013. Parker & O’Grady apparently have something to do with the
Barclay’s Bank subpoena since Barclay’s Bank is a private client of Parker &
O’Grady: [https://www.reuters.com/world/us/barclays-subpoenaed-by-us-virgin-](https://www.reuters.com/world/us/barclays-subpoenaed-by-us-virgin-islands-over-epstein-ties-2021-11-05/)
[islands-over-epstein-ties-2021-11-05/](https://www.reuters.com/world/us/barclays-subpoenaed-by-us-virgin-islands-over-epstein-ties-2021-11-05/)
- (8) Of the thousands of homes across Westfield, Massachusetts that *The Murphy*
Organized Crime Family could have sought to maliciously prosecute and criminally
harass for over the past 8.5 years, *The Murphy Organized Crime Family* chose to go
after their next door neighbors. Prior to the fake bombing event with the faked
injuries and the faked deaths of the crisis actors, that is to say, between, say, January
2013 through April 2013, I, Jason Kapinos, had no contact whatsoever with *The*
Murphy Organized Crime Family and *The Murphy Organized Crime Family* have
Behavioral Health Network to give them whatever it is that they want for the benefit
of Kenneth Albano from Bacon & Wilson; Paul H. Rothschild from Bacon &

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 Wilson; and Kathryn Crouss from Bacon & Wilson while Gary F. Bevilacqua seems
2 to be involved in a joint criminal enterprise with Philip R. Smith from Bacon &
3 Wilson as indicated by the room that they share on 94 North Elm Street in Westfield,
4 Massachusetts.

5 (9) The *Murphy Organized Crime Family* appears to be connected to Nathaniel Philip
6 Rothschild from Lazard Asset Management whose father is Jacob Rothschild, 4th
7 Baron Rothschild who founded what is now RIT Capital Partners since Munges,
8 Tolles, and Olson is involved in litigation in which Debra L. Murphy has vested
9 financial interests and it also appears that Kirkland & Ellis is involved while Kirkland
10 & Ellis represent Verizon where United States Attorney General Bill Barr “used to”
11 work. Notice how per the Registry of Deeds, *The Murphy Organized Crime Family*
12 has been represented by Susan Conlon Philips who also represents the City of
13 Westfield Public Schools and while “Judge” O’Grady was friends with Susan Conlon
14 Philips. Also, notice how “Attorney” William J. O’Grady has worked alongside
15 “Attorney” Roberto Braceras for Goodwin Procter while “Attorney” Roberto
16 Braceras serves on the judicial nominating committee for the State of Massachusetts
17 for the benefit of private clients of Goodwin Procter like Bank of America which
18 created the high stakes white collar crimes of The One Fund on the 17th of April
19 2013.

20 (10) Kyle Murphy was, as far as I, Jason Kapinos, can tell, hand-selected for the
21 Sheriff’s Office of Hampden County since Egan, Flanagan, and Cohen represent
22 Pope Francis High School which is where Kyle Murphy purportedly graduated while
23 Kyle Murphy then purportedly attended Pope Francis High School. Afterwards, Kyle
24 Murphy was apparently hand-selected for the Sheriff’s Office of Hampden County
25 since Attorney Thomas Day serves on the Board of Directors for both Pope Francis
26 High School and the Sheriff’s Office for Hampden County at the same time.

27 Back in May 2013, Behavioral Health Network already knew about the material that was
28 abused to frame the two Tsarnaev brothers for the Boston Hoax Bombings because it had
29 been forwarded to them from Doctor Stamm from Pioneer Valley Ear Nose & Throat.
30 Likely, back on the 10th of January 2013, Behavioral Health Network already knew about
31 the email that had been sent to the Beth Israel Deaconess Medical Center and, quite
32 likely, decided to allow it to be abused so that Tamerlan Tsarnaev could undergo a pre-
33 meditated murder by means of a bone saw. So, what Behavioral Health Network does is
34 frame or allow innocent people to be framed for crimes and then criminally conspires
35 with law enforcement to murder them.

36 This trend continues before the Hampden County Superior Court since “Judge” Flannery
37 serves on the bench of the Hampden County Superior Court and he “used to” work for
38 Parker & O’Grady and while he “used to” work for the District Attorney’s Office of
39 Hampden County and the Northwestern District. Moreover, “Judge” McDonough “used
40 to” work for Egan, Flanagan, and Cohen for the Sheriff’s Office of Hampden County
41 where Kyle Murphy works as a so-called corrections officer and while he serves on the
42 Westfield “Police” Force. Kyle Murphy lived at 90 Hawks Circle next door to me, Jason
43 Kapinos.

1 You, by your behavior, already threw my case for the benefit of the wealthier clients of
2 Morisi & O'Connell like Toronto Dominion Bank that created these problems for me
3 with the "Boston Strong" concert. Moreover, Westfield Gas & Electric is represented by
4 Welch, Campbell, and Barba, and WG&E were behind a series of suspicious municipal
5 lien certificates both before and after the Boston Hoax Bombings of the 15th of April
6 2013. For example, Steven C. Downs at 100 Hawks Circle had taken out a mortgage
7 around the 17th of March 2013, that is to say, about one month prior to Tamerlan
8 Tsaraev's execution being foreshadowed in *Turban Cowboy*. *A House on the Bayou* is
9 reminiscent of Hawks Circle after *The Murphy Organized Crime Family* criminally
10 trespassed and notice how Alex McAulay is involved in *A House on the Bayou* and he
11 was likely chosen in reference to Macaulay Culkin as to how Edward James Murphy
12 subverted Hawks Circle for KPMG's benefit, making my "house" into what might as
13 well be *Home Alone* in consideration of his heinous crimes like being involved in
14 kidnapping me once in January 2017; twice in April 2020; once in September 2020; and
15 once in May 2021 with the intent to drug, extort money, and to extort labor. The air
16 conditioner kickback racket or whatnot at 90 Hawks Circle has everything to do with this
17 because around the same time, Bibi Netanyahu wanted the public to fund his private air
18 conditioning. It might as well be *Jason Kapinos is Home Alone with Bibi Netanyahu and*
19 *Edward James Murphy* followed by Edward Murphy's *Honey! I Dismembered the Kids*.
20 And this is with "Judge" O'Grady, "Judge" McKenna, "Judge" Rota, and, to some extent,
21 "Judge" Groce as well as "Magistrate" Byrnes and "Magistrate" Morin going along with
22 it as well as "Associate District Attorney" Tyler James Kennefick and "Associate District
23 Attorney" Andrew Ott. Obviously, District Attorney Anthony Gulluni had a preference
24 for the Westfield Police as represented by Parker & O'Grady over me, Jason Kapinos.

16 I noticed how the UBER and LYFT drives appear to be privy to the fact that there is
17 something sinister about Hawks Circle, asking me whether the neighborhood was "safe".
18 Louisiana Bay was likely chosen in reference to Louisiana and Capital One Bank North
19 America along with the staged car accident and the investigations from the State of
20 Louisiana. This case can be cited as a precedent against Steven C. Downs at 100 Hawks
21 Circle: [https://lawandcrime.com/crime/you-must-be-the-devil-for-what-you-did-illinois-
22 man-convicted-of-murdering-and-dismembering-woman-gets-nearly-one-century-of-
23 prison-time/](https://lawandcrime.com/crime/you-must-be-the-devil-for-what-you-did-illinois-man-convicted-of-murdering-and-dismembering-woman-gets-nearly-one-century-of-prison-time/) I suspect that it was the law firm of Shatz, Schwartz and Fentin P.C. behind
24 this because Shatz, Schwartz and Fentin P.C. represents United Bank as well as Sisters of
25 Providence Health Systems. Gary F. Bevilacqua from Bacon & Wilson seems to be
26 behind this joint criminal enterprise with Philip R. Smith from Bacon & Wilson like at 22
27 Hawks; 90 Hawks; 76 Hawks; and elsewhere. The houses which appear to be criminal
28 co-conspirators are the black security cameras at 100 Hawks; 90 Hawks; 79 Hawks; and
29 55 Hawks as well as 180 Prospect Street Extension and the Ring Doorbells at 130
30 Hawks; 40 Hawks; 90 Hawks; and 175 Prospect Street Extension. 97 Hawks Circle, for
31 instance, is a front for Egan, Flanagan, and Cohen as well as Parker & O'Grady and
32 Bulkley, Richardson, and Gelinas. Eugene Makucha works for the City of Springfield,
33 Massachusetts public schools as represented by Bulkley, Richardson, and Gelinas while
34 Jeffrey S. Cahill from the Northwestern District Attorney's Office is represented by
35 Parker & O'Grady as well as Egan, Flanagan, and Cohen while Parker & O'Grady also

1 represent Easthampton Savings Bank which underwrites 97 Hawks Circle. Easthampton
2 Savings Bank is also represented by Nutter, McLennan, and Fish who represent the
3 Boston Bar Association as well as The Combined Jewish Philanthropies and the Beth
Israel Deaconess Medical Center.

4 For example, on the 24th of August 2021, instead of indicting, arresting, and arraigining,
5 Bibi Netanyahu, Westfield Police for the benefit of William J. O’Grady of Parker &
6 O’Grady and Egan, Flanagan, and Cohen for the Sheriff’s Office of Hampden County
7 sought to go after me, Jason Kapinos, instead. So, obviously, the needs of the country of
8 Israel come before those of Americans. “Judge” O’Grady, “Judge” McKenna, “Judge”
9 Rota, and “Judge” Groce are more than content to subvert the private property rights of
10 Americans for Israel. Refer to: Netanyahu told to return \$900,000 in gifted legal funds
from US billionaires <https://www.timesofisrael.com/netanyahu-told-to-return-900000-in-gifted-legal-funds-from-us-billionaires/> Notice how it was the Israeli Attorney General
who instructed Bibi Netanyahu to return the US funds to US billionaires. This indicates
how the United States of America takes its marching orders from Israel.

11 Remember, one of the largest known clients of Parker & O’Grady is Barclay’s Bank with
12 the second largest institutional shareholder, the last time that I checked of Lazard Asset
13 Management where Nathaniel Philip Rothschild “used to” work or works. His father,
14 Jacob Rothschild, 4th Baron Rothschild, founded RIT Capital Partners and Jacob
15 Rothschild, 4th Baron Rothschild is involved in The BlackStone Group which concerns
16 EntertainmentOne which represents *WithinTheRuin* from Westfield, Massachusetts. The
17 “song”, “Feeding Frenzy”, Thematically relates to what happened to Tamerlan Tsarnaev.
18 **The District Attorney’s Office for Hampden County very well could be extraditing
19 to the United States of America, Jacob Rothschild, 4th Baron Rothschild as well as
20 Nathaniel Philip Rothschild along with Prince Andrew.** As to Prince Andrew, refer to:
21 Consider this article: ‘Royals murdered & tortured our people:’ Prince Charles to face
22 slavery protest”Our people and our ancestors have suffered under the hands of British
23 exploitation, which was organised at a very high level.”
24 <https://www.thelondoneconomic.com/lifestyle/royals-murdered-tortured-our-people-prince-charles-to-face-slavery-protest-302779/> Just look at what the “Royal” family was
25 behind here: <https://boston.cbslocal.com/2013/04/25/mother-of-bombing-suspects-america-took-my-kids-away-from-me/> I suspect this victim of Prince Andrew might
26 believe he was behind Tamerlan Tsarnaev’s pre-meditated murder by means of a bone
27 saw: TRAGIC PAST Prince Andrew’s cousin claims she was abused as a child by a
28 ‘murderer’ as she releases new Ghislaine Maxwell book <https://www.the-sun.com/news/3947347/prince-andrew-cousin-abused-epstein-ghislaine-maxwell/>

How do I, Jason Kapinos, fit into this mess? Dzhokhar Tsarnaev was apparently
employed by the Beth Israel Deaconess Medical Center to partake in a drill that was my
stolen intellectual property from my medical records at what Jeff Rense calls, “The
Mossad No Mercy Hospital”. This campaign is apparently from this lawyer from DLA
Piper: <https://www.dlapiper.com/en/us/people/h/howell-geoff/> Notice how the Beth Israel

1 Deaconess Medical Center willfully and maliciously destroyed evidence that exculpated
2 the two Tsarnaev brothers as can be seen here:

3 The sudden influx of supporting e-mails made it clear that there was a concerted effort to
4 overwhelm our website with these messages. We had messages about the victims falling
5 next to messages about freeing Tsarnaev. For the next few days, we had to regularly
6 spend time and effort cleaning the site of similar messages. Ultimately a court, not
7 BIDMC, will determine Tsarnaev's guilt or innocence. As distasteful as some of the
8 messages were, they certainly might fit somewhere in cyberspace—just not in an attack
9 aimed at taking down our website or making it wholly offensive to many of our Facebook
10 users, including employees and patients.

11 [http://healthlawreporter.bbablogs.org/2014/01/08/bidmc-and-the-boston-marathon-
12 bombings/](http://healthlawreporter.bbablogs.org/2014/01/08/bidmc-and-the-boston-marathon-bombings/)

13 This never should have been up to any court but rather up to the police officers that were
14 on Boylston Street in Boston, Massachusetts as well as the paramedics that took care of
15 the 264 or so crisis actors. And one of those police officers on Boylston Street in Boston,
16 Massachusetts was Westfield "Police" Captain Michael McCabe as represented by
17 William J. O'Grady from Parker & O'Grady. We both know who butters Bibi
18 Netanyahu's Bagels and Lox as well as Judge "Groce as in Grocery Store" because it's
19 Susan McCoy from Cooley Shriar who represent Judge who pronounces his name "Groce
20 as in Grocery Store". Judge Groce as in "Grocery Store" also has his housing
21 underwritten by Bank of America as he oversees a Bank of America case while he is
22 being represented by Cooley Shriar as Halloran & Sage acquired Cooley Shriar on the 1st
23 of July 2021. So, you're allowing *The Murphy Organized Crime Family* to abuse an
24 application for a criminal complaint of harassment so that it is "criminally harassing" to
25 Edward James Murphy for him to carry out economic espionage
26 (<https://www.fbi.gov/file-repository/economic-espionage-1.pdf/view>) against me when
27 I complain about economic espionage: [https://www.fbi.gov/file-repository/economic-
28 espionage-1.pdf/view](https://www.fbi.gov/file-repository/economic-espionage-1.pdf/view) The individual who sought the application of a criminal complaint
for "harassment" was none other than Westfield "Police" Officer Jared Hague who might
be related to The Hagues from 111 Hawks Circle while "Officer" Jared Hague is
represented by Attorney Richard Sypek who also represents Sarah LaFlamme at 79
Hawks Circle while "Attorney" Richard Sypek also represents The Saltmarshes at 55
Hawks Circle. Obviously, "Attorney" Richard Sypek has preferred to protect this cartel
of lawyers who protect Edward James Murphy while they pretend to be in opposition to
him with the "Big Mesquite Murph" character: Cleary, Gottlieb, Steen & Hamilton;
Cravath, Swaine & Moore; Paul, Weiss, Rifkind, Wharton & Garrison; Latham &
Watkins, and Shearman & Sterling [https://news.bloomberglaw.com/us-law-week/cbs-
viacom-tap-stable-of-prestigious-law-firms-for-mega-merger](https://news.bloomberglaw.com/us-law-week/cbs-viacom-tap-stable-of-prestigious-law-firms-for-mega-merger) So, this application for a
criminal complaint of "harassment" is, in actuality, revenge by both Bacon & Wilson by
means of Behavioral Health Network as well as revenge by Egan, Flanagan, and Cohen
by means of "Judge" McDonough before the Hampden County Superior Court since
Egan, Flanagan, and Cohen represent not only the Sheriff's Office of Hampden County
and the mutual client of Bacon & Wilson, Toronto Dominion Bank, but Egan, Flanagan,

28 MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 and Cohen also represent what is now Bank of America and while Egan, Flanagan, and
2 Cohen represent Sisters of Providence Health Systems which used to own Providence
3 Behavioral Health Hospital before it was acquired on or around the 16th of February
4 2021, that is to say, within the same 24-hour period or so that I, Jason Kapinos, was
5 summoned by the constable for *Bank of America versus Jason Kapinos* and which also
6 took place within the same timeframe of *Joyner versus Behavioral Health Network* when
7 Behavioral Health Network was summoned. It was likely Egan, Flanagan, and Cohen
8 who were behind the abuse of a psychiatric section 12 in April 2020 since Egan,
9 Flanagan, and Cohen also represent the Town of Greenfield, Massachusetts where I,
10 Jason Kapinos, was illegally detained at Baystate Franklin Medical Center as represented
11 by Skoler, Pressor, and Abbott, a client of One Monarch Place in Springfield,
12 Massachusetts as owned by Paul C. Picknelly who also owns Westfield Court Associates,
13 LLC and while he serves as the “auditor” of Western New England Bancorp as
14 represented by Bacon & Wilson while Bacon & Wilson also represent Behavioral Health
15 Network by means of Paul H. Rothschild as well as Kenneth Albano and Kathryn Crouss,
16 a criminal co-conspirator against me, Jason Kapinos, on the Hampden County Bar
17 Association by means of the malicious prosecutor, Associate District Attorney Tyler
18 James Kennefick whose father, Thomas A. Kennefick, used to work on the Board of Bar
19 Overseers until after I, Jason Kapinos, complained by Associate District Attorney Tyler
20 James Kennefick to the Board of Bar Overseers. So, Westfield Police Captain Michael
21 McCabe ran in the Boston Marathon of the 15th of April 2013, and Michael McCabe does
22 not want to be held criminally or civilly responsible for the pre-meditated murders that he
23 was behind as foreshadowed in the episode of *Family Guy* known as “Turban Cowboy”
24 which is apparently why NewsCorporation split on the 27th of June 2013. This case can
25 be cited as a precedent against Westfield “Police” Captain Michael McCabe: ‘She Should
26 Spend Time In Prison’: Former DA Accused of ‘Showing Favor’ to the McMichaels
27 Awaits Her Day In Court on Charges Over Delayed Arrests In Ahmaud Arbery’s Slaying
28 <https://news.yahoo.com/she-spend-time-prison-former-000000762.html> Associate
District Attorney Andrew Ott obviously favored Edward James Murphy who supports
live human organ harvesting and torture. If wanted to be truthful about “District
Attorney” Anthony Gulluni, it would be, “Every Communist [like Hampden County
District Attorney Anthony Gulluni] must grasp the truth, “Political power grows out of
the barrel of a gun.”” And that’s why District Attorney Anthony Gulluni supports the
extra-judicial executions of witnesses to the innocence of the two Chechen Muslim
Tsarnaev brothers because Chechens fought what is now the former Soviet Union. And
since Edward James Murphy who claims to have worked on the FBI’s Joint Terrorism
Task Force as well as the Westfield Police is opposed to the innocence of the two
brothers, that means Edward James Murphy, by his behavior, is a communist. Refer to
this article from *The Washington Times*: Democrats aghast at outing as communists
[https://www.washingtontimes.com/news/2020/feb/20/democrats-aghast-outing-
communists/](https://www.washingtontimes.com/news/2020/feb/20/democrats-aghast-outing-communists/) That’s why Edward James Murphy criminally conspires against me with his
friend, Craig Charvat at 89 Hawks Circle and cut down a tree at the back of his driveway
because it’s supposed to represent kidnapping me and murdering me while in police
custody. Craig Charvat and his wife also then lit the tree stump on fire and threw trash
into the tree stump. This indictment can be cited as a precedent against Edward James

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 Murphy and his criminal co-conspirators across Hawks Circle:
2 [https://www.justice.gov/usao-wdpa/pr/violent-neighborhood-gang-known-hazelwood-](https://www.justice.gov/usao-wdpa/pr/violent-neighborhood-gang-known-hazelwood-mob-dismantled)
3 [mob-dismantled](https://www.justice.gov/usao-wdpa/pr/violent-neighborhood-gang-known-hazelwood-mob-dismantled) At the same time, however, Associate District Attorney Andrew Ott
4 finds problems with Vadym Misiruk who purportedly went up to his friend and
5 dismembered him. Associate District Attorney Andrew Ott, however, won't apply that
6 same standard to the two Tsarnaev brothers because there is a cartel of conservatively
7 thousands of lawyers who will lose their professional livelihoods once it is exposed how
8 they lied in unison about the two brothers in violation of what is known as the
9 "Prohibition on Anarchy". So, those were actually about 264 or so 18 USC Conspiracy
10 Against Rights violations against Dzhokhar Tsarnaev, Tamerlan Tsarnaev, and others like
11 Ibragim Todashev and me, Jason Kapinos, as those were 264 or so crisis actors and
12 Edward James Murphy knowingly perjured himself, claiming that the bombs which were
13 abused at the Boston Marathon of the 15th of April 2013 originated from my private
14 residence, all the while knowing that to have been false for over the past 8.5 years, or
15 Edward James Murphy chose to not do his due diligence.

16 Most notably, Tamerlan Tsarnaev purportedly was employed by 22 News WWLP,
17 indicating that, if true, then he was, whether he knew it or not, being human trafficked by
18 LIN Corporation as represented by Crevier & Ryan and while Crevier & Ryan also
19 represent Hampden County "Sheriff" Kyle Murphy and Westfield "Police" Officer Kyle
20 Murphy for the benefit of Edward James Murphy of the Westfield Police and FBI's Joint
21 Terrorism Task Force. 22 News WWLP is an NBC affiliated and NBC is owned by
22 Comcast as represented by Gibson, Dunn, and Crutcher while Gibson, Dunn, and
23 Crutcher are private clients of KPMG, the employer, current or former or both current
24 and former of Debra L. Murphy. It would make sense the Tamerlan Tsarnaev might be
25 employed by 22 News WWLP because Nick Morganelli "used to" work for 22 News
26 WWLP and "represents" Ward 1 in Westfield, Massachusetts, and Doctor Stanley
27 Stzempko might be related to Adam Stzempko from 22 News WWLP. Thus, it makes
28 sense for 22 News WWLP to want to frame Alex Jones listeners for terrorism to induce
public hatred against them. This is quite likely why the hearing as to *Edward James
Murphy* versus *Jason Kapinos*, if I, Jason Kapinos, remember correctly is scheduled for
the 11th of January 2021 because back on the 10th of January 2013, there very well could
have been a court-order psychiatric evaluation. However, the Westfield Police knowingly
went out of their way to allow the Boston Marathon to be hoax bombed and me, Jason
Kapinos, framed for the benefit of William J. O'Grady of Parker & O'Grady whose
private client is Barclay's Bank which is tied up with Jeffrey Epstein and Ghislaine
Maxwell. Refer to:

29 Vanity license plates of L43562 at 175 Prospect Street Extension which appeared perhaps
30 in Winter/Spring 2019 and 735RM1 which was seen in August 2021 or so indicate that I,
31 Jason Kapinos, am being criminally stalked by the Sheriff's Office for Hampden County
32 as represented by the law firm of Egan, Flanagan, and Cohen and, in particular, Attorney
33 Thomas Day. Remember, Egan, Flanagan, and Cohen allowed the Boston Hoax
34 Bombings of the 15th of April 2013 since Westfield Police were aware back on the 10th of
35 January 2013 of what I, Jason Kapinos, had written to the Beth Israel Deaconess Medical

1 Center which, unbeknownst to me, was then abused to create what is known as “Turban
2 Cowboy” on *Family Guy*. However, Seth McFarlane, since he did such a superlative job
3 at his allowing Tamerlan Tsarnaev to be dismembered with a bone saw per a torture
4 contract, nevertheless, received a \$200 million dollar contract on the 10th of January 2013
5 when I, Jason Kapinos, was criminally stalked at Cumberland Farms in Westfield,
6 Massachusetts as what is now owned by EG Group as owned by TDR Capital. Refer to
7 “An Act Prohibiting the Participation of Healthcare Professionals in the Torture and the
8 Abuse of Prisoners’ which deters, say, John Yoo from Gibson, Dunn, and Crutcher from
9 his apparent campaign to harvest the human organs of Tamerlan Tsarnaev while Comcast
10 will, quite likely, be claiming otherwise. Comcast will, quite likely be claiming that the
11 Boston Hoax Bombings were “just” a “movie set gone wrong”. Rather, it was a targeted
12 domestic assassination.

13 The Sheriff’s Office for Hampden County was apparently criminally stalking me back in
14 September 2019. However, it appears that the Sheriff’s Office for Hampden County as
15 represented by Attorney Thomas Day from Egan, Flanagan, and Cohen were too busy
16 concocting tall-tales about Vadym Misiruk to block the entry of COVID-19 into the
17 United States of America, and neither did Hampden County “Sheriff” Kyle Murphy who
18 joined the Sheriff’s Office of Hampden County in September 2019, that is to say, the
19 same month that Jacob Lupton of KPMG left ARAG that he joined in April 2019 so that
20 he could leave ARAG in September 2019, which, remember, was the same month that
21 Kyle Murphy joined the Sheriff’s Office for Hampden County. Egan, Flanagan, and
22 Cohen for the Sheriff’s Office of Hampden County should have known about this back in
23 Summer/Fall 2019: China PCR Purchases Spiked in Months Before First Known Covid
24 Cases, Firm Says [https://www.bloomberg.com/news/articles/2021-10-04/china-pcr-
25 purchases-spiked-in-months-before-first-known-covid-cases-firm-says](https://www.bloomberg.com/news/articles/2021-10-04/china-pcr-purchases-spiked-in-months-before-first-known-covid-cases-firm-says) That’s likely why
26 China wanted a seat on INTERPOL to block criminal liability for the release of COVID-
27 19 outside of the Wuhan Province.

28 Sarah LaFlamme, as far as I, Jason Kapinos, can tell, never genuinely wanted to reside on
Hawks Circle besides for the benefit of the private clients of Bulkley, Richardson, and
Gelinias like Chase Bank, Bank of America, and The Bank of New York Mellon that are
behind mortgage crimes at 79 Hawks Circle for the benefit of Bill Gates of K&L Gates
since Polish National Credit Union is represented by K&L Gates while Polish National
Credit Union underwrites the mortgage at 79 Hawks Circle for Sarah LaFlamme of The
McClure Insurance Agency as represented by Lyon & Fitzpatrick while Lyon &
Fitzpatrick also represent The Dowd Agencies which acquired The Wilcox Insurance
Agency on the 1st of July 2021, that is to say, the same day as *Bank of America* versus
Jason Kapinos before Judge “Groce as in Grocery Store” as represented by Susan McCoy
from Cooley Shriar and while Cooley Shriar was acquired by Halloran & Sage on the 1st
of July 2021. Sarah LaFlamme also sells Arbella Insurance which is represented by
Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo while Mintz, Levin, Cohn, Ferris,
Glovsky, and Popeo represent not only the United Arab Emirates which sought a position
on INTERPOL but also Mintz, Levin, Cohn, Ferris, Glovsky, and Popeo represent Shari
Redstone of CBS/VIACOM as one can see here: <https://www.mintz.com/industries->

1 [practices/case-studies/shari-redstone-achieves-complete-victory-viacom-dispute](https://www.reuters.com/article/us-viacom-m-a-cbs-court/former-cbs-shareholders-can-sue-shari-redstone-over-viacomcbs-merger-idUSKBN29X02B) Refer to
2 this lawsuit against Shari Redstone of CBS/VIACOM:

3 [https://www.reuters.com/article/us-viacom-m-a-cbs-court/former-cbs-shareholders-can-](https://www.reuters.com/article/us-viacom-m-a-cbs-court/former-cbs-shareholders-can-sue-shari-redstone-over-viacomcbs-merger-idUSKBN29X02B)
4 [sue-shari-redstone-over-viacomcbs-merger-idUSKBN29X02B](https://www.reuters.com/article/us-viacom-m-a-cbs-court/former-cbs-shareholders-can-sue-shari-redstone-over-viacomcbs-merger-idUSKBN29X02B) I, Jason Kapinos,
5 complained to Shari Redstone at, I believe, her National Amusements phone number that
6 the snuff film of *Patriot's Day* which aired in the Communist-run Chinese AMC Theaters
7 not air because it was securing a pending judicial murder against Jahar Tsarnaev who
8 never should have even been a criminal suspect on the 17th of April 2013. Notice how
9 Cleary Gottlieb Steen & Hamilton LLP chose to protect a known criminal, Shari
10 Redstone as to, for instance, the sales of "BlackRock" in the City of New York as one
11 can see here: [https://nypost.com/2021/08/17/viacomcbs-sells-black-rock-headquarters-in-](https://nypost.com/2021/08/17/viacomcbs-sells-black-rock-headquarters-in-nyc-for-760m/)
12 [nyc-for-760m/](https://nypost.com/2021/08/17/viacomcbs-sells-black-rock-headquarters-in-nyc-for-760m/) That above-mentioned sale happened around the time that Bibi
13 Netanyahu, the former Prime Minister of Israel, illegally entered into the United States of
14 America. Around the 24th of August 2021, that is to say, the time-frame of my
15 arraignment for *Commonwealth of Massachusetts versus Jason Kapinos*, a 2.7 billion
16 dollar data center is scheduled to be built nearby Hawks Circle as one can see here:
17 [https://datacentremagazine.com/data-centres/dollar27bn-data-centre-development-](https://datacentremagazine.com/data-centres/dollar27bn-data-centre-development-proposed-massachusetts)
18 [proposed-massachusetts](https://datacentremagazine.com/data-centres/dollar27bn-data-centre-development-proposed-massachusetts) Cleary Gottlieb Steen & Hamilton LLP also chose to protect
19 CBS/VIACOM as to its sale of the studio in California:

20 [https://nypost.com/2021/10/26/viacomcbs-nears-sale-of-cbs-studios-lot-in-la-as-it-pares-](https://nypost.com/2021/10/26/viacomcbs-nears-sale-of-cbs-studios-lot-in-la-as-it-pares-real-estate-holdings/)
21 [real-estate-holdings/](https://nypost.com/2021/10/26/viacomcbs-nears-sale-of-cbs-studios-lot-in-la-as-it-pares-real-estate-holdings/) That happened around the time-frame of my status hearing for
22 *Commonwealth of Massachusetts versus Jason Kapinos*. Prince Andrew should be
23 extradited to the United States of America and held criminally responsible for Tamerlan
24 Tsarnaev's pre-meditated murder by means of a bone saw if indeed he had known about
25 the murder weapon. I suspect that Tamerlan Tsarnaev's pre-meditated murder by means
26 of a bone saw apparently had something to do with the GCHQ and a cyber-magic
27 program. Refer to: "We want to build Cyber Magicians." Did the GCHQ consult actual
28 magicians or what?

1 [https://www.reddit.com/r/Magic/comments/1z0nyx/we_want_to_build_cyber_magicians](https://www.reddit.com/r/Magic/comments/1z0nyx/we_want_to_build_cyber_magicians_did_the_gchq/)
2 [did_the_gchq/](https://www.reddit.com/r/Magic/comments/1z0nyx/we_want_to_build_cyber_magicians_did_the_gchq/) This indictment can be cited as a precedent to have the criminals at the
3 GCHQ behind Tamerlan Tsarnaev's pre-meditated murder extradited. Pasadena Man
4 Who Cyberstalked and Made Threats to Injure, Rape and Kill Sentenced to More Than 3
5 Years in Federal Prison LOS ANGELES – A British national was sentenced today to 37
6 months in federal prison for making a series of graphic online threats to harm, rape and
7 kill. [https://www.justice.gov/usao-cdca/pr/pasadena-man-who-cyberstalked-and-made-](https://www.justice.gov/usao-cdca/pr/pasadena-man-who-cyberstalked-and-made-threats-injure-rape-and-kill-sentenced-more-3)
8 [threats-injure-rape-and-kill-sentenced-more-3](https://www.justice.gov/usao-cdca/pr/pasadena-man-who-cyberstalked-and-made-threats-injure-rape-and-kill-sentenced-more-3) This indictment can be cited against the
9 criminals from Great Britain at the Magic Circe and Silver Circle Law Firms: Acting U.S.
10 Attorney Announces Extradition Of British Citizen For Operating An International
11 Money Laundering And Fraud Network [https://www.justice.gov/usao-sdny/pr/acting-us-](https://www.justice.gov/usao-sdny/pr/acting-us-attorney-announces-extradition-british-citizen-operating-international-money)
12 [attorney-announces-extradition-british-citizen-operating-international-money](https://www.justice.gov/usao-sdny/pr/acting-us-attorney-announces-extradition-british-citizen-operating-international-money)

13 Back in January 2017, it was the job of the both the City of Westfield, Massachusetts
14 Police to have exposed the 264 or so crisis actors who had feigned their injuries and their
15 deaths at the Boston Hoax Bombings of the 15th of April 2013. Moreover, it was the job
16 of "Attorney" Susan Abbott from Goodwin Procter on the 17th of April 2013 to not

17 MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 underwrite \$61 million, \$101 million, or so. Apparently, Edward James Murphy also
2 somehow found out that it is Wilcox Insurance Agency which sold Quincy Mutual
3 Insurance to 96 Hawks Circle and “Attorney” Richard Sypek allowed The Dowd
4 Agencies to acquire Wilcox Insurance Agency on the 1st of July 2021 as one can read
5 about here ([https://www.dowd.com/the-dowd-agencies-acquires-wilcox-insurance-](https://www.dowd.com/the-dowd-agencies-acquires-wilcox-insurance-agency/)
6 [agency/](https://www.dowd.com/the-dowd-agencies-acquires-wilcox-insurance-agency/)) , that is to say, the same day as *Bank of America versus Jason Kapinos*. Most
7 notably, outside counsel for Quincy Mutual is Doherty, Wallace, Pillsbury, and Murphy
8 who also represent the City of Westfield, Massachusetts as well as Bank of America and
9 Westfield Court Associates, LLC. Here are a list of some clients of Doherty, Wallace,
10 Pillsbury, and Murphy: [https://www.martindale.com/organization/doherty-wallace-](https://www.martindale.com/organization/doherty-wallace-pillsbury-and-murphy-pc-574154/)
11 [pillsbury-and-murphy-pc-574154/](https://www.martindale.com/organization/doherty-wallace-pillsbury-and-murphy-pc-574154/) Notice how Doherty, Wallace, Pillsbury, and Murphy
12 are located within One Monarch Place as owned by Paul C. Pickenly while One
13 Monarch Place is represented by Murphy & McCoubrey, the firm that I, Jason Kapinos,
14 was referred to in January 2019 to dispute credit card “debt” as to Santander, a private
15 client of Bulkley, Richardson, and Gelinas who represent Westfield Emergency
16 Physicians who failed to punish the 264 or so crisis actors who feigned their injuries and
17 their deaths at the Boston Hoax Bombings of the 15th of April 2013. So, not only does
18 Paul C. Pickenly own Westfield Court Associates, LLC as represented by Murphy &
19 McCoubrey, so too is Westfield Court Associates, LLC represented by Doherty, Wallace,
20 Pillsbury, and Murphy but also, most interestingly, Bacon & Wilson by means of
21 “Attorney” Julie A. Dialessi-Lafley who can be reached here:
22 <https://www.baconwilson.com/attorney/dialessi-lafley-julie-a/> So, Westfield Court
23 Associates, LLC is inherently a human trafficking operation and extortion operation for
24 the benefit of the private clients of Bacon & Wilson like TD Bank and Westfield Bank as
25 well as Behavioral Health Network as well as for the private clients of Murphy &
26 McCoubrey like Chicopee Savings Bank which was acquired by Western New England
27 Bancorp as apparently by “Attorney” Richard Schaberg from Hogan Lovells.

18 So, the acquisition of The Wilcox Insurance Agency by The Dowd Agencies appears to
19 have been a “strategic” move by Richard Sypek for the City of Westfield “Police”
20 Commission who joined the Police Commission within the same 24-hour period or so
21 that Cleary Gottlieb Steen & Hamilton LLP defrauded the United States Supreme Court
22 as to Sandy Hook and Nelson & Kennard, a private client of Barclay’s Bank, that is to
23 say, the same private client of Parker & O’Grady performed a soft pull on my credit score
24 while William J. O’Grady from Parker & O’Grady also represents not only the City of
25 Westfield, Massachusetts but William J. O’Grady from Parker & O’Grady also represent
26 Westfield “Police” Captain Michael McCabe in his private capacity as William J.
27 O’Grady from Parker & O’Grady represent the City of Westfield, Massachusetts “Police”
28 Department. So, not only do Parker & O’Grady allow the terrorist attacks over which
they blame and frame me, Jason Kapinos, Parker & O’Grady then criminally conspire by
means of “Judge” O’Grady from Parker & O’Grady to confiscate the private property of
me, Jason Kapinos, before the Hampden County Superior “Court” by means of, say,
either “Judge” Flannery or “Judge” McDonough since “Judge” McDonough “used to”
work for Egan, Flanagan, and Cohen who represent the Sheriff’s Office of Hampden
County while “Judge” Flannery “used to” work for Parker & O’Grady as well as the

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 District Attorney's Office of Hampden County which allowed the Boston Hoax
2 Bombings of the 15th of April 2013 over which I, Jason Kapinos, was framed on the 23rd
3 of September 2020 before, of course, "Judge" O'Grady as well as "Judge" John P.
4 McKenna who was appointed by "Governor" Charlie Baker who is "Boston Strong".

5 Notice how on the 26th of May 2021, that is to say, the same day as *Bank of America*
6 versus *Jason Kapinos*, Cravath, Swaine, and Moore
7 (<https://www.cravath.com/news/amazons-dollar845-billion-acquisition-of-mgm.html>) ;
8 Paul Weiss ([https://www.paulweiss.com/practices/transactional/mergers-](https://www.paulweiss.com/practices/transactional/mergers-acquisitions/news/mgm-to-be-acquired-by-amazon-for-845-billion?id=40213)
9 [acquisitions/news/mgm-to-be-acquired-by-amazon-for-845-billion?id=40213](https://www.paulweiss.com/practices/transactional/mergers-acquisitions/news/mgm-to-be-acquired-by-amazon-for-845-billion?id=40213)) ; and
10 Latham & Watkins ([https://www.lw.com/news/latham-watkins-advises-mgm-](https://www.lw.com/news/latham-watkins-advises-mgm-acquisition-amazon)
11 [acquisition-amazon](https://www.lw.com/news/latham-watkins-advises-mgm-acquisition-amazon)) apparently carried out economic espionage against me, Jason
12 Kapinos. So too did Anchorage Capital. Bill Gates who is tied up with K&L Gates who
13 were behind the high stakes white collar crimes of The One Fund also is apparently
14 interested in *Bank of America* versus *Jason Kapinos*, especially since Sarah LaFlamme at
15 79 Hawks Circle. Notice how Latham & Watkins represent Joe "The Bone Saw" Biden
16 administration which allowed Tamerlan Tsarnaev to be dismembered by a bone saw
17 apparently. Refer to: [https://www.law.com/nationallawjournal/2021/02/01/latham-](https://www.law.com/nationallawjournal/2021/02/01/latham-watkins-pipeline-to-biden-administration-expands-with-another-exit-for-doj/)
18 [watkins-pipeline-to-biden-administration-expands-with-another-exit-for-doj/](https://www.law.com/nationallawjournal/2021/02/01/latham-watkins-pipeline-to-biden-administration-expands-with-another-exit-for-doj/) Latham &
19 Waktins also represent ENTERCOM which airs Howie Carr who denied Tamerlan
20 Tsarnaev the status of a human being: Speedbump magnets have arrived! I'll be up late
21 fulfilling orders. Watch me on Channel 25 at 7:45 with VB.
22 <https://twitter.com/howiecarrshow/status/337026878021984257?lang=en>

23 The Dowd Agencies is represented by Lyon & Fitzpatrick. "Attorney" Richard Sypek's
24 wife, Cathy Sypek, worked or works for The Dowd Agencies and "Attorney" Richard
25 Sypek is more than content to protect Seth "Svengali" McFarlane and his \$200 million
26 dollar contract as one can read about here: [https://www.hollywoodreporter.com/tv/tv-](https://www.hollywoodreporter.com/tv/tv-news/seth-macfarlane-inks-200m-deal-nbcuniversal-1260123/)
27 [news/seth-macfarlane-inks-200m-deal-nbcuniversal-1260123/](https://www.hollywoodreporter.com/tv/tv-news/seth-macfarlane-inks-200m-deal-nbcuniversal-1260123/) Most notably, it's The
28 Dowd Agencies that share the same office spaces as Parker & O'Grady along with Lyon
& Fitzpatrick. Cooley Shriar have both Bank of America and Toronto Dominion Bank as
a private client. Egan, Flanagan, and Cohen for the Sheriff's Office of Hampden County
also have both Toronto Dominion Bank and Bank of America as a private client. Thus,
the goal is to have me kidnapped and murdered, I suspect, in the Hampden County Jail as
part of Hampden County "Sheriff" Kyle Murphy's gang initiation for the benefit of Bank
of America and Toronto Dominion Bank. This protection racket continues on before
"Judge" Flannery on the Hampden County Superior Court as a protection racket for
Parker & O'Grady whose private clients are Elm Electric where my cousin Mark Kapinos
worked or works as well as my cousin-in-law Richard Kapinos worked or works and
while Parker & O'Grady have other private clients.

Applications of criminal complaints of "harassment" by Edward James Murphy who
worked on the Westfield Police and the FBI's Joint Terrorism Task Force were never
intended so that if I were to do anything adverse financially to my neighbor, I am not any
longer permitted to reside inside of my private residence. You can also tell that Hampden

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER

1 County District Attorney Anthony Gulluni is a Nazi because he expects me to do the
2 work of all the criminals for physicians who lied across the Boston, Massachusetts
3 hospitals about the two Tsarnaev brothers. I suspect that Nazi Hunters has to deal with
4 Anthony Gulluni. However, at the same time, I am attacked by "Attorney" Brian Mahany
5 who indicates that I will be "put down" like a "filthy dog". It's obvious that Judge Groce
6 is beholden to Israel because he chooses to be represented by Cooley Shriar. Notice how
7 when it concerned the vehicle ramming incident in Wisconsin, the Pope as represented by
8 Egan, Flanagan, and Cohen for the Sheriff's Office of Hampden County sent his
9 condolences. Meanwhile, the Pope supports judicially murdering Dzhokhar Tsarnaev
10 even though Egan, Flanagan, and Cohen for the Sheriff's Office of Hampden County has
11 evidence that exculpates Dzhokhar Tsarnaev through one of their clients, BerkshireLife.
12 Cooley Shriar also represents the Roman Catholic Church and Judge "Groce as in
13 Grocery Store" at the same time that Cooley Shriar represents The Golub Corporation
14 which owns Price Chopper.

15 If Anthony Gulluni were honest he would say, "And we would call people with Autism,
16 "logs", and the joke at the District Attorney's Office for Hampden County was how many
17 PointPickup, Instacart, or SHIPT orders we could tortiously interfere with, poison, and
18 then murder them while "legitimizing" this before "Judge" Flannery on the Hampden
19 County Superior Court as well as "Judge" McDonough on the Hampden County Superior
20 Court for the benefit of Egan, Flanagan, and Cohen. So, this is the perfect storm of
21 corruption. The Executive Office of the Trial Courts for the State of Massachusetts
22 should not be allowing a "former" attorney for a municipal police department which, in
23 my case, happens to be O'Grady from Parker & O'Grady, like in my case, the City of
24 Westfield, Massachusetts, to then later become a "Judge" on that same municipal
25 government's city court which, in my case, happens to be the Westfield District Court.
26 That's called running a protection racket for the Westfield Police as it would have been
27 for any of the 62 District Courts in the State of Massachusetts at any of the 62 District
28 Courts in the State. In the case of O'Grady, he did not just represent the Municipal Police
Department but the Police Captain, Michael McCabe, in his individual capacity and while
O'Grady also represents the City of Westfield, Massachusetts Law Department at the
same time as private banks like Easthampton Savings Bank and Barclay's Bank. As if
this were not awful enough, the trend of the Parker & O'Grady/Westfield Police
protection racket then continued on before the Hampden County Superior Court before
"Judge" Flannery for Parker & O'Grady benefit as well as "Judge" McDonough for
Egan, Flanagan, and Cohen's benefit. As to Egan, Flanagan, and Cohen, they represent
the Roman Catholic Church at the same time as Bank of America and Toronto Dominion
Bank, making Roman Catholics and Roman Catholicism the preferred religion of
Hampden County which violates the separation of Church and State.

29 There's also the issue of entrapment where Edward Murphy goes out of his way to
30 criminally harass me with neighbors concerning the saw related projects and when I
31 complain about it, I have "borderline criminally harassed". So, how am I to get Edward
32 James Murphy to stop criminally harassing me with hand saws. This means that
33 Associate District Attorney Tyler James Kennefick and Associate District Attorney

1 Andrew Ott are a police protection racket and police murder protection racket.
2 Essentially, this gives Edward James Murphy a "blank cheque" to murder whoever he
3 wants. So, what Associate District Attorney Tyler James Kenefick and Associate District
4 Attorney Andrew Ott are aiming to do away with is the "right to due process" and yet
5 they support the "right to due process" in the case of Vadym Misiruk. One difference
6 between Vadym Misiruk versus the case of Tamerlan Tsarnaev is how there was not a
7 cartel of thousands of lawyers (conservatively) to support the lies of Vadym Misiruk. In
8 the case of Vadym Misiruk, there were about only 625 "news" stories published about
9 Vadmy Misiruk. In *United States versus Tsarnaev*, however, there were about at least
10 405,000 results for "Dzhokhar Tsarnaev". The major news and entertainment media
11 chose to knowingly publish fake news stories about Dzhokhar Tsarnaev even though he
12 tweeted, "Fake story" on the 16th of April 2013. Refer to:
13 [https://www.theguardian.com/us-news/2015/mar/10/fbi-testimony-boston-marathon-
14 bomb-trial-dzhokhar-tsarnaev](https://www.theguardian.com/us-news/2015/mar/10/fbi-testimony-boston-marathon-bomb-trial-dzhokhar-tsarnaev)

15 Sincerely,

16 

17 Jason Kapinos, *pro se*

18 96 Hawks Circle

19 Westfield, Massachusetts 01085-1576

20 jasonkapinos@gmail.com

21 **CERTIFICATE OF SERVICE**

22 The undersigned certifies a copy of the foregoing document, was served to Hampden County
23 Superior Court (by RPost.; Fax and Priority Mail); J. Gerard Stranch IV from BS&J Branstetter
24 Stranch & Jennings PLLC (by RPost); Lynn A. Toops from Cohen & Malad, LLP (by RPost);
25 Michael S. Appel from Sugarman Rogers Barshak (by RPost.) ; and Lynda R Jensen from
26 Mullen Coughlin LLC (by RPost); and KCC Class Action Services by (RPost).

27 Sincerely,

28 

Jason Kapinos, *pro se*

96 Hawks Circle

Westfield, Massachusetts 01085-1576

jasonkapinos@gmail.com

MOTION TO OBJECT TO CLASS ACTION SETTLEMENT OFFER