

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MASSACHUSETTS

IN RE:
NICHOLAS SOUTHWICK-HALL

Chapter 7

Case No. 17-30471-EDK

Debtor.

GREGORY GOFF &
DANA GOLDBLATT

Plaintiffs

Adversary Pro. No. 17-03030

v.

NICHOLAS SOUTHWICK-HALL

Defendant

**JOINT MOTION TO APPROVE JOINT STIPULATION CONCERNING SETTLEMENT
AGREEMENT**

Now Come Nicholas Southwick-Hall (“Defendant”) and Gregory Goff and Dana Goldblatt (“Plaintiffs”) and hereby jointly move to approve the parties’ Joint Stipulation Concerning Settlement Agreement. In support thereof the parties state as follows:

- 1) The parties, through counsel, have negotiated and executed a settlement agreement settling and resolving all three counts of the Plaintiffs’ complaint in exchange for agreed to specified performance by the Defendant.

- 2) The parties, through counsel, have entered into a Joint Stipulation Concerning Settlement Agreement a copy of which is attached hereto and marked as Exhibit "A".
- 3) The parties jointly move this Court to approve said Joint Stipulation Concerning Settlement Agreement.

WHEREFORE, Counsel for the parties respectfully jointly pray this Court for an Order approving the attached Joint Stipulation Concerning Settlement Agreement.

Respectfully submitted this the 19th day of July, 2018.

The Defendant,
Nicholas Southwick-Hall
By: His Attorney,

The Plaintiffs
Gregory Goff & Dana Goldblatt
By: Their Attorney

/s/ David J. Noonan, Esq.
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EXHIBIT "A"

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Defendant
.....

JOINT STIPULATION CONCERNING SETTLEMENT AGREEMENT

Now come Nicholas Southwick-Hall (“Defendant”) and Gregory Goff and Dana Goldblatt (“Plaintiffs”) and hereby agree and stipulate to the following:

- 1) Plaintiffs and Defendant, through counsel, have entered into a written settlement agreement which provides that Defendant has 120 days from July 18, 2018 to complete his tendering to the Plaintiffs of his agreed to performance (“Defendant’s Performance”).
- 2) Upon completion of the Defendant’s Performance the parties shall file a Joint Stipulation of Dismissal with Prejudice terminating this adversary proceeding.

- 3) In the event Defendant fails to fully or timely tender Defendant's Performance Plaintiffs shall notify the Court and request that the trial of this adversary proceeding be rescheduled.
- 4) Plaintiffs and Defendant reserve any and all applicable rights pending the filing of the anticipated Joint Stipulation of Dismissal With Prejudice.

Respectfully submitted this the 19th day of July, 2018.

The Defendant,
Nicholas Southwick-Hall
By: His Attorney,

The Plaintiffs
Gregory Goff & Dana Goldblatt
By: Their Attorney

/s/ David J. Noonan, Esq.
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