Date Filed 10/11/2023 12:49 PM
Superior Court - Worcester
Docket Number 2385CV00572

COMMONWEALTH OF MASSACHUSETTS
SUPERIOR COURT DEPARTMENT

WORCESTER SS **CIVIL ACTION NO. 2385CV00572**

****

CANDACE AVERY, f/n/a
CANDACE LOEWEN
Plaintiff
vs.

HAROLD D. AVERY a/k/a
HAROLD AVERY a/k/a
HARRY AVERY, 15 WABAN LLC,
17 WABAN STREET
WORCESTER, LLC, and
HCA INVESTMENTS, LLC
Defendants

****

AGREEMENT FOR JUDGMENT

NOW COME THE PARTIES AND AGREE AS FOLLOWS:

That Judgment shall enter forthwith in favor of the Plaintiff, Candace Avery in the amount of Three Hundred Thousand ($300,000.00) Dollars against the named Defendants. Defendant, Harold D. Avery, individually and as Manager of the LLCs, as well as the other named Defendants shall pay to the Plaintiff Candace Avery the total sum of Three Hundred Thousand ($300,000.00) Dollars from the sale of Defendants' properties located at 15-17 and 19-21 Waban Avenue, Worcester, MA. Upon the sale of the property at 15-17 Waban Avenue, Worcester, MA., Defendants shall pay to Plaintiff the sum of Two Hundred Thousand ($200,000.00) Dollars. An additional One Hundred ($100,000.00) Dollars shall be paid to Plaintiff from the sale of 19-21 Waban Avenue, Worcester, MA. Judgment shall enter forthwith for CANDACE AVERY f/k/a CANDACE LOEWEN in the amount of THREE HNUDRED THOUSAND ($300,000.00) Dollars. The Plaintiff shall be able to recover her costs and Attorney's fees in all supplementary proceedings and post judgment proceedings against the Defendants to enforce the Judgment. This Judgment shall survive bankruptcy proceedings and shall not be dischargeable in bankruptcy. The Defendants agree not to dissipate or secrete assets to avoid satisfying the judgment. Should the Judgment remain unsatisfied even after the sale of any properties located at 15-17 and 19-21 Waban Avenue, Worcester, MA. the Plaintiff may levy and execute against any real property standing in the name of Harold D. Avery, or Harry Avery, individually or as Manager of an LLC. The Defendants waive all rights of appeal.

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Plaintiff, Candace Avery
By her Attorney,

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Date: 10/11/2023

Stephen G. Abraham
By his Attorney

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Date: 10/5/23

Signed freely and voluntarily this 9th day of October 2023 by me Harold D. Avery a/k/a Harry Avery

Harold D. Avery a/k/a Harry Avery, Individually

Harold D. Avery
as Manager of 15 WABAN LLC, 17 WABAN STREET WORCESTER, LLC, and HCA INVESTMENTS, LLC

Signed freely and voluntarily this 11th day of October 2023 by me Candace Avery f/k/a Candace Loewen

Candace Avery, f/k/a Candace Loewen