

8.

Affidavit in Support of Elizabeth Vaughan's
Opposition to Vaughan Parents' Petition to Supreme
Judicial Court

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPREME JUDICIAL COURT
FOR SUFFOLK COUNTY
CIVIL ACTION NO. _____

SAMUEL AND JOAN R. VAUGHAN,)
)
) Petitioners,)
)
 v.)
)
) ELIZABETH H. VAUGHAN,)
)
) Respondent)

AFFIDAVIT OF MICHELLE S. LABRECQUE IN OPPOSITION
TO SAMUEL AND JOAN R. VAUGHAN'S "PETITION TO
INVOKE THE GENERAL SUPERINTENDENCE OF THE COURT"
UNDER M.G.L. c. 231 §118

Now comes Michelle S. LaBrecque, and on oath,
deposes and states as follows:

1. I have been an attorney with the law firm of Burns & Levinson with offices located at 125 Summer Street, Boston, Massachusetts, since June, 1989.
2. Having worked on the matter now before the Probate Court, and being familiar with the issues, I appeared before the Essex Division of the Probate and Family Court sitting at Salem, Gould J. presiding, on May 3, 1991, on the Defendant/Respondent's Motion to Compel Further Answers to Interrogatories.
3. Although the court denied the Motion to Compel Further Answers, it suggested, as an alternative, that both of the parties disclose the nature and extent of

their parents' respective estates, and enter into a Stipulation which would be reported back to the court.

4. The court suggested that such a voluntary disclosure might obviate the need for further inquiry.

5. Counsel for both parties agreed to pursue this with their clients.

6. Counsel for the Defendant/Respondent had already been provided with the relevant information regarding the Defendant/Respondent's father's estate and stood ready to provide such information.

SIGNED under the pains and penalties of perjury.

11/19/91
Dated

Michelle S. LaBrecque
Michelle S. LaBrecque