

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss

SUPERIOR COURT
DEPARTMENT OF THE TRIAL COURT

CITY OF BOSTON OFFICE OF THE
COLLECTOR-TREASURER
Plaintiff

v.

CIVIL ACTION NO.: 2481-CV-2985

BARBARA LYNCH,
NO. 9 PARK, LLC,
BARBARA LYNCH GRUPPO, INC.,
550 TREMONT LLC,
552 TREMONT LLC,
354 CONGRESS LLC,
BAR 348 CONGRESS LLC,
552 TREMONT LLC, STIR, and
SPORTELO
Defendants

BARBARA LYNCH COLLECTIVE, INC. and
BARBARALYNCH INC.
Reach And Apply Defendants

STIPULATION AND PROPOSED ORDER -OF THE PARTIES

This matter having come before the Court on Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction to Preserve Assets to Secure Eventual Judgment, and after negotiation and consideration of all the papers filed in connection therewith and oral argument, Plaintiff City of Boston Office of the Collector-Treasurer ("City of Boston") and the Defendants collectively ("the Parties"), hereby stipulate to the following and jointly request that the Court enter the following as an Order in this matter as follows:

The Companies, No. 9 Park, LLC, Barbara Lynch Gruppo, Inc., 550 Tremont LLC, 552 Tremont LLC, 354 Congress LLC, Bar 348 Congress LLC, 552 Tremont LLC, Stir, Sportello, Barbara Lynch Collective, Inc. and BarbaraLynch Inc. ("the Companies"), hereby stipulate that no

payment of any kind and/or of any distributions or allocations to any investor, shareholder, member, officer or director of the companies, whether by direct payment or accrued payroll will be made, and agree that all monies received from operations and proceeds from sales of any company assets shall be held in escrow by a third party escrow agent, terms of such escrow agreement to be mutually agreed upon, until further Court order other than in and for the normal course of business operations. The Companies represent and warrant that they are actively using commercially reasonable best efforts to ensure any sale of business assets for maximum value/profit. The parties agree that this Stipulation and Order shall remain in effect pending a resolution of the Complaint filed in this matter, at which time the escrowed monies will be utilized for payment of taxes and any other amounts resolved as due and owing to the City of Boston such as principal, interest and other statutory charges resulting from the resolution of this Complaint first and then for any other outstanding obligations of the Companies. All parties reserve their rights as pled in the Complaint and Answer with respect to the relief requested. This Order shall remain in effect until further order of the court:

City of Boston-Treasurer Collector,

Celia Bortoy, Asst Collector ^{By} EMMILY LEBLANC
Name/Title

Date: 12/13/24

Andrea Martin / Asst. Counsel ^{By} EMMILY LEBLANC
Counsel for Plaintiff

Date: 12/13/24

SHARON LARRANE TOWNSEND-HALL (C.O.O.)
Defendants by: Name Title

Date: 12/13/24

[Signature]
Counsel for Defendants

Date: 12/13/24