

Commonwealth of Massachusetts

Estate of June Elbery

Norfolk County Probate Court
Docket # NO15P1491

Heir, Michael Elbery's, 1st Demand to Personal Representative of the Estate of June Elbery, Attorney James A. McLaughlin, for Production of Documents as Allowed by Rule 34 of M.R.C.P.

At long last, on this day of 8-15-17, Michael Elbery has finally received Attorney James A. McLaughlin's "First Account" of the Estate of June Elbery, which was docketed by the Norfolk County Probate Court on 7-31-17.

Per review of Attorney James A. McLaughlin's "First Account", there is massive Fraud and falsifications, including fabricated Bank Balances, fraudulent accounting entries, and arithmetic plugs to make Attorney James A. McLaughlin's "First Account" balance.

As provided by Massachusetts Supplemental Probate Law, Rule 27A, heir to the Estate of June Elbery, Michael Elbery, exercises his right to demand Discovery as provided by the M.R.C.P. Rules 26-37, now that his Appearance and Objection to McLaughlin's "First Account" has been filed with the Norfolk County Probate Court on 8-7-17. And Michael Elbery Demands Documents from Attorney James A. McLaughlin as follows:

1. Produce all Bank Statements of the Estate of June Elbery.
2. Produce all Bank Statements of the Santander Bank Account of the Estate of June Elbery with the account number 5869.
3. Produce all Bank Statements of the Santander Bank Account of the Estate of June Elbery with the account number 7176.
4. Produce all Checks of any and all bank accounts used to record financial activity, and, or, cash disbursement of the Estate of June Elbery.

- a. Produce both back and front of each check so to insure all disclosures including processing through the banking system of each check.

5. Produce all bids made by anyone, including the heirs of the Estate of June Elbery, on the Lionel Train Set that is part of the Probated Estate of June Elbery and is in the cellar of the Estate House of June Elbery at 168 Fairfield St., Needham, Mass.

- a. include any cancellations of the bids submitted as requested in 5.

Send Documents to: Michael Elbery, heir to the Estate of June Elbery
470 Memorial Drive#237
Chicopee, Mass. 01020

Certificate of Service

I, Michael Elbery, heir to the Estate of June Elbery, certify that I sent this "First Demand for Documents from PR Attorney James A. McLaughlin" to Attorney James A. McLaughlin, 8E Pleasant St., So. Natick, Mass. 01760 via U.S. Express Priority Mail EL 540478795, prepaid, on August 16, 2017.

And the Norfolk Probate and Family Court at 35 Shawmut Road, Canton, Mass. 02021, and to David Elbery's, attorney, Billy Crowe at 77 Franklin St., 3rd floor, Boston, Mass. 02110, and,

Kathleen Elbery at 168 Fairfield St., Needham, Mass. 02492
Joyce Elbery 39650 USHwy 19NH581, Tarpon Springs, FL 34689
Robert Elbery, 100 Acorn St., Millis, Massachusetts 02054
All on August 16, 2017 via U.S. first class mail prepaid.