

**HEARING DATE: 4/12/24**

STATE OF RHODE ISLAND  
WASHINGTON, SC.

SUPERIOR COURT

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LLOYD ALBERT, JEAN ALBERT,  
DALE CORDY, NANCY CORDY,  
RAYMOND PARISEAULT,  
ROSEMARY PARISEAULT,  
GORDON WRIN, KATRINA WRIN,  
ROBERT PATTERSON, and  
MARY BURKE PATTERSON,  
Petitioners

C. A. No. WC-2024-0027

V.

THE BONNET SHORES FIRE DISTRICT,  
by and through its Chairperson,  
CAROL O'DONNELL, its Vice Chairperson,  
MARLENE BELLINI, and its Council Members,  
ANTHONY DEANGELIS, BILL DELGIZZO,  
CAROLYN DILEO and STEVEN DANUSZAR,  
Respondents

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**MOTION OF PETITIONERS LOUISE HEALY ET AL TO INTERVENE**

Now come the Petitioners, Louise Healy, Paul Healy, Lee Vick, Alexa Boone, Jesse Paoella, Patricia Paoella, Landy Paoella, Jennifer Beaulieu, Thomas Beaulieu, Brian Fleming, Gina Fleming, Lori Pezzullo, Mark Laurito, Kyle Laurito, Donna Jeffrey, Marie Kilduff, Leigh Oliver, Julie Fitzgerald, Jim Fitzgerald, Marijane Hackett, Erin Mernick, Brad Fox, Danielle Fox, Carol DiPaolo, Stefan Regelmann, Janice Regelmann, Michael Shapiro, Angelica Igliazzi, Erik Morse, Jessica Ayvazyan, Josh Ayvazyan, and Robert Strom (hereinafter the Non-Resident Bonnet Shores Beach Club Condominium [BSBCC] Unit Owners) and move, pursuant to the provisions of Rule 24 of the Rhode Island Superior Court Rules of Civil Procedure, to intervene in this matter as of right.

As grounds therefore, the Non-Resident BSBCC Unit Owners have a substantial interest in the subject matter which is the basis for the plaintiffs' action, and are so situated that

the disposition of this action may, as a practical matter, impair or impede the Non-Resident BSBCCA Unit Owners' ability to protect their voting interests. Furthermore, the Non-Resident Unit Owners do not believe that their interests will be adequately represented by any of the existing parties in this action. The Petitioners have submitted a Memorandum in support of the instant motion.

WHEREFORE, the Petitioners, Louise Healy, et al, respectfully request that their Motion to Intervene be GRANTED.

### **NOTICE OF HEARING**

Please take notice that the undersigned will bring the above motion on for hearing before the Court on Friday, April 12, 2024 at 9:30 a.m.

LOUISE HEALY, PAUL HEALY, LEE VICK,  
ALEXA BOONE, JESSE PAOLELLA, PATRICIA  
PAOLELLA, LANDY PAOLELLA, JENNIFER  
BEAULIEU, THOMAS BEAULIEU, BRIAN  
FLEMING, GINA FLEMING, LORI PEZZULLO,  
MARK LAURITO, KYLE LAURITO, DONNA  
JEFFREY, MARIE KILDUFF, LEIGH OLIVER,  
JULIE FITZGERALD, JIM FITZGERALD,  
MARIJANE HACKETT, ERIN MERNICK,  
BRAD FOX, DANIELLE FOX, CAROL DIPAOLO,  
STEFAN REGELMANN, JANICE REGELMANN,  
MICHAEL SHAPIRO, ANGELICA IGLIOZZI,  
ERIK MORSE, JESSICA AYVAZYAN,  
JOSH AYVAZYAN, and ROBERT STROM

By their Attorney,

/s/ Michael W. Garland

Michael W. Garland #6394

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**CERTIFICATE OF SERVICE**

I, Michael W. Garland, hereby certify that on the 7<sup>th</sup> day of March, 2024, I filed the within document through Odyssey EFile and Service with service to counsel of record.

*/s/ Michael W. Garland*

Michael W. Garland