

COMMONWEALTH OF MASSACHUSETTS

BRISTOL ss.

SUPERIOR COURT  
C.A NO.: BRCV2013-01204

BRISTOL, SS SUPERIOR COURT  
FILED

URSULA WARD as Personal Representative  
of the Estate of Odin Lloyd, Deceased,

APR 27 2017

*Plaintiff,*

MARC J. SANTOS, ESQ.  
CLERK/MAGISTRATE

v.

AARON HERNANDEZ,

*Defendant.*

**PLAINTIFF'S EMERGENCY MOTION TO SUBSTITUTE SHAYANNA JENKINS HERNANDEZ, SPECIAL PERSONAL REPRESENTATIVE OF THE ESTATE OF AARON HERNANDEZ, SÆ E NANT**

NOW COMES the plaintiff, URSULA WARD as Personal Representative of the Estate of Odin Lloyd, Deceased, in the above entitled action and hereby moves this Honorable Court to substitute Shayanna Jenkins Hernandez, as special personal representative of the estate of Aaron Hernandez, as Defendant in this claim. There are time sensitive issues relating to assets that need to be addressed on an emergency basis.. As grounds in support of this motion, Plaintiff states as follows:

1. Defendant, Aaron Hernandez past away on April 19, 2017. (*Exhibit A*)
2. A suggestion of death was filed in this case by prior defense counsel on April 21, 2017. (*Docket Document #49*)
3. On April 21, 2017, decedent-defendant's fiancé, Shayanna Jenkins Hernandez filed petitions for adjudication of intestacy, appointment as personal representative of decedent's estate, as well as appointment as special personal repetitive decedent's estate. *Bristol County Probate Court, Docket No. BR17P0845EA (Exhibit B)*
4. Shayanna Jenkins Hernandez was appointed Special Personal Representative of decedent's estate on April 21, 2017, by the Bristol County Probate Court, Docket No. BR17P0845EA (*Exhibit C*)
5. In Ms. Jenkins Hernandez's Motion for Appointment as Special Personal Representative as well as in her sword affidavit she states that the purpose of an

4/27/2017 Allowed. By agreement exhibit D will be temporarily impounded pending a real estate closing. McCutcheon, J.

immediate Letter of Authority is in order to file and respond to legal action in Superior Court as well as preserve assets.

6. It is clear Ms. Jenkins-Hernandez intends to be a party to Superior Court claims as the representative of the estate of decedent, Aaron Hernandez and as such she should be substituted in as defendant in this action so the parties may move forward.
7. The parties were working towards a resolution to this case at the time of Mr. Hernandez's death. As this court is aware the parties entered into an agreement to sell the property owned by Aaron Hernandez located at 22 Ronald C. Myer Drive, North Attleboro, Massachusetts.
8. Counsel has been working with Keller Williams Realty to sell the property and last night received an offer of \_\_\_\_\_ which expires on Friday, April 28, 2017.  
*(Exhibit D) - Impounded per McGuire, J. on 4/27/17*
9. Past offers have not been responded to and the property continues to lose value and become further encumbered by federal and municipal liens. The house is currently uninsured and this asset is in danger of being lost if it is not sold.

For the foregoing reasons, Plaintiff respectfully requests that the Court Order that Shayanna Jenkins Hernandez, as special personal representative of the estate of Aaron Hernandez be substituted as Defendant in this action.

The Plaintiff,  
By her attorneys,



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CERTIFICATE OF SERVICE

I hereby certify this 25<sup>th</sup> day of April, 2017, that a copy of the within document is being served upon Counsel of Record in this action as indicated below:

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