

COMMONWEALTH OF MASSACHUSETTS

WESTERN DIVISION, SS.

HOUSING COURT  
DEPARTMENT OF  
THE TRIAL COURT  
CIVIL ACTION  
No. 13-CV-493

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CITY OF SPRINGFIELD  
CODE ENFORCEMENT DEPARTMENT  
HOUSING DIVISION,

Plaintiff

v.

SANDRA PEREZ (owner)  
ARAMIS PEREZ (owner)  
DEUTSCHE BANK NATIONAL TRUST COMPANY  
ON BEHALF OF FINANCIAL ASSET SECURITIES  
CORP., SOUNDVIEW HOME LOAN TRUST  
2007-WMC1, ASSET BACKED CERTIFICATES,  
SERIES 2007-WMC1 (mortgagee)  
BRANDY VEGA (tenant),  
Defendants

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Re: Premises: 66 Pasadena Street, Springfield, MA

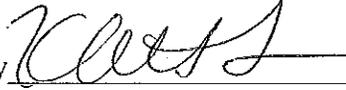
**RECEIVER'S MOTION TO APPROVE RENOVATION PLAN**

Now comes the Receiver, Witman Properties, Inc., and moves that this Honorable Court approve the attached Renovation Plan for the receivership property located at 66 Pasadena Street, Springfield, Massachusetts. The Receiver reserves the right to motion the Court to amend the Renovation Plan if additional costs or expenses are identified during the renovation.

WHEREFORE, the Receiver requests that the instant Motion be allowed and that said Renovation Plan be approved.

WITMAN PROPERTIES, INC.  
RECEIVER

Date: January 21, 2014

By   
Katharine Higgins-Shea, Esq. - BBO #662738  
Lyon & Fitzpatrick, LLP  
Whitney Place  
14 Bobala Road, 4<sup>th</sup> Floor  
Holyoke, MA 01040  
(413) 536-4000  
Fax (413) 536-3773

NOTICE OF MOTION

**TO:** Attorney Lisa C. DeSousa  
City of Springfield  
Code Department  
95 State Street, 6<sup>th</sup> Floor  
Springfield, MA 01103

Sandra Perez  
372 Park Street, Apt. 4  
Bristol, CT 06010

Aramis Perez  
24 Fanwood Avenue  
Chicopee, MA 01020

Deutsche Bank National Trust Company on behalf of Financial Asset Securities Corporation, Soundview Home Loan Trust 2007-WMC1, Asset Backed Certificates, Series 2007-WMC1  
1761 E Street Andrew Place  
Santa Ana, CA 92705

Rachelle D. Willard., Esq.  
Ablitt Scofield P.C.  
304 Cambridge Road  
Woburn, MA 01801

Brandy Vega  
66 Pasadena Street  
Springfield, MA 01108

Please take notice that the undersigned will bring the foregoing **Motion to Approve Renovation Plan** on for hearing before this Court at Springfield on **Friday, February 7, 2014, at 9:30 a.m.** on that date or as soon thereafter as counsel can be heard.



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Katharine Higgins-Shea, BBO #662738  
Lyon & Fitzpatrick, LLP  
Whitney Place, 14 Bobala Road  
Holyoke, MA 01040  
413-536-4000  
FAX: 536-3773

Dated: January 21, 2014

**CERTIFICATE OF SERVICE**

I hereby certify that I caused a copy of the within document to be served on the following by first class mail:

Attorney Lisa C. DeSousa  
City of Springfield  
Code Department  
95 State Street, 6<sup>th</sup> Floor  
Springfield, MA 01103

Sandra Perez  
372 Park Street, Apt. 4  
Bristol, CT 06010

Aramis Perez  
24 Fanwood Avenue  
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Deutsche Bank National Trust Company on behalf of Financial Asset Securities Corporation, Soundview Home Loan Trust 2007-WMC1, Asset Backed Certificates, Series 2007-WMC1  
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Ablitt Scofield P.C.  
304 Cambridge Road  
Woburn, MA 01801

Brandy Vega  
66 Pasadena Street  
Springfield, MA 01108

on this 21 day of January, 2014.

  
Katharine Higgins-Shea, Esquire

WITMAN PROPERTIES, Inc.  
26 Camden St. South Hadley MA, 01075  
(413)-687-4770

1/20/14

## Report and Redevelopment Plan for 66 Pasadena St, Springfield MA

### Receivership 13-CV-493



#### **Description of Property:**

The property located at 66 Pasadena St is a two family Dwelling of approximately 2418sq feet of living space. The property was condemned on June 4<sup>th</sup> 2013 for numerous emergency violations including damage to multiple walls, floors and ceilings from a badly damaged and leaking roof and plumbing. There are also numerous electrical violations including open electrical panels and boxes, unauthorized wiring, exposed splices and wiring, and improperly secured wiring. There is an extensive amount of trash and other personal property in the house, basement and garage. A large trailer which appears to be unregistered occupies the driveway. The mechanical systems are in disrepair and the property is in need of general repairs.

The first floor tenant, Brandy Vega has appeared during the hearings of this receivership and has been living with family since the condemnation. The second floor of the property was occupied by squatters at the time the receivership took place and those individuals were escorted off the property in the presence of Law Enforcement, the receiver and the owner's wife. During a site visit the Brandy Vega was able to identify which personal property in the house was hers. Her property has remained secure inside the house but Mrs. Vega has since become inaccessible via phone and no plans have been made to remove her property from the dwelling.

## **Work Performed:**

Progress is outlined below:

1. Provide Access to Brandy Vega to identify personal possessions and evaluate property.
2. Meet police and owner at the property while illegal 2<sup>nd</sup> floor is escorted out.
3. Board and secure property.
4. Maintain Security of the building and grounds keeping.

## **Rehabilitation Plan:**

The property was accessed and evaluated on 12-2-13 and 12-5-13. The property needs extensive updating and rehabilitation. The roof is leaking badly and needs to be replaced. There is a considerable amount of damage to the walls, floor, and ceilings of the 1<sup>st</sup> and 2<sup>nd</sup> floors from water coming in through the roof. The basement of the house has the remains of what appears to be two illegal apartments. There are exposed wires throughout the property and in the basement. The boilers are very old and appear to be in need of replacement as do the hot water heaters. There is a large amount of trash in the property and in the basement. The property also needs general plumbing and electrical repairs and updates, interior cosmetic work, lead paint testing and remediation, and other general repairs to be compliant with CMR 4:10.

Once approved we will start on the repair schedule presented below. The end result will be a building with marketable code-compliant, lead-paint compliant rental units. The general scope of the repairs includes removing the trash from the house and removing the remains of the illegal apartment from the basement. Replacing the roof on the house. Repairing water damage inside the property including replacing a number of walls floor ceilings. Testing and repairing mechanical systems including electrical, plumbing and heating. General repairs.

### **By 3-15-14**

1. Temporarily patch roof until weather permits replacement.
2. Turn electricity on and repair electrical hazards
3. Remove trash from the house and garage
4. Remove trash remains of illegal apartment in the basement.
5. Restore heat and utilities and repair as necessary.

### **5-15-14**

6. Begin repairing water damage to walls, floors and ceilings.
7. Perform Lead Paint Testing
8. Begin Lead remediation which most likely requires window replacement throughout the house.

9. Begin interior repair work including patching drywall, and repairing interior trim, repainting and refinishing and replacing floors as necessary.
10. Replace roof if not already done.

#### **6-15-14**

11. Finish plumbing and electrical work.
12. Finish Cosmetic and de-leading work
13. Permit sign offs & Inspections
14. Market the units for rent.

#### **6-15-14 Completion Goal**

#### **Estimated Project Costs:**

Given the scope and detail of the improvements we estimate that the additional repair costs will be in the range of \$27-\$30/sqft for the 2418 square foot building for a total of **\$65,000-\$75,000**. It should be noted that this is an estimate of repair costs only and does not include an estimate of legal costs or utility costs and is based on the assumption that the heating systems can be repaired rather than replaced.

#### **Costs:**

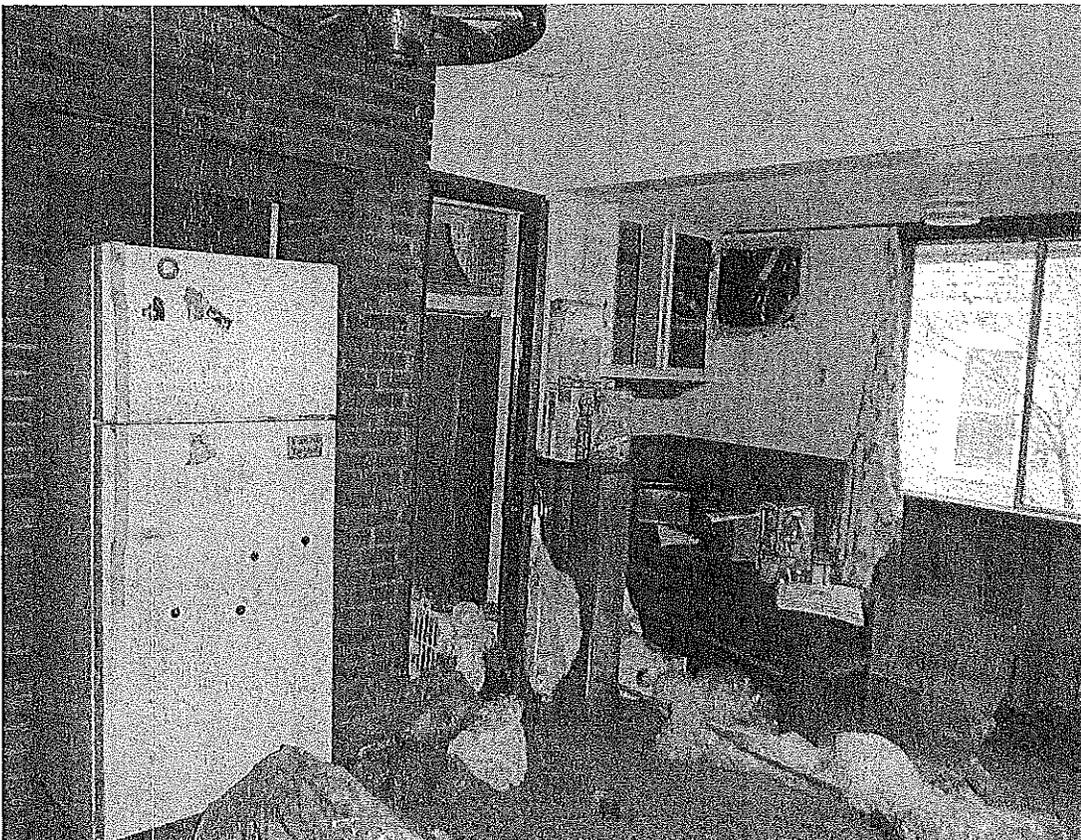
Costs of \$2,482.29 have incurred since 12/2/13 detailed in attached invoice 14576. Supporting Documentation is also attached.

**Pictures:** Accompanying pictures show work in progress as of 1-20-14

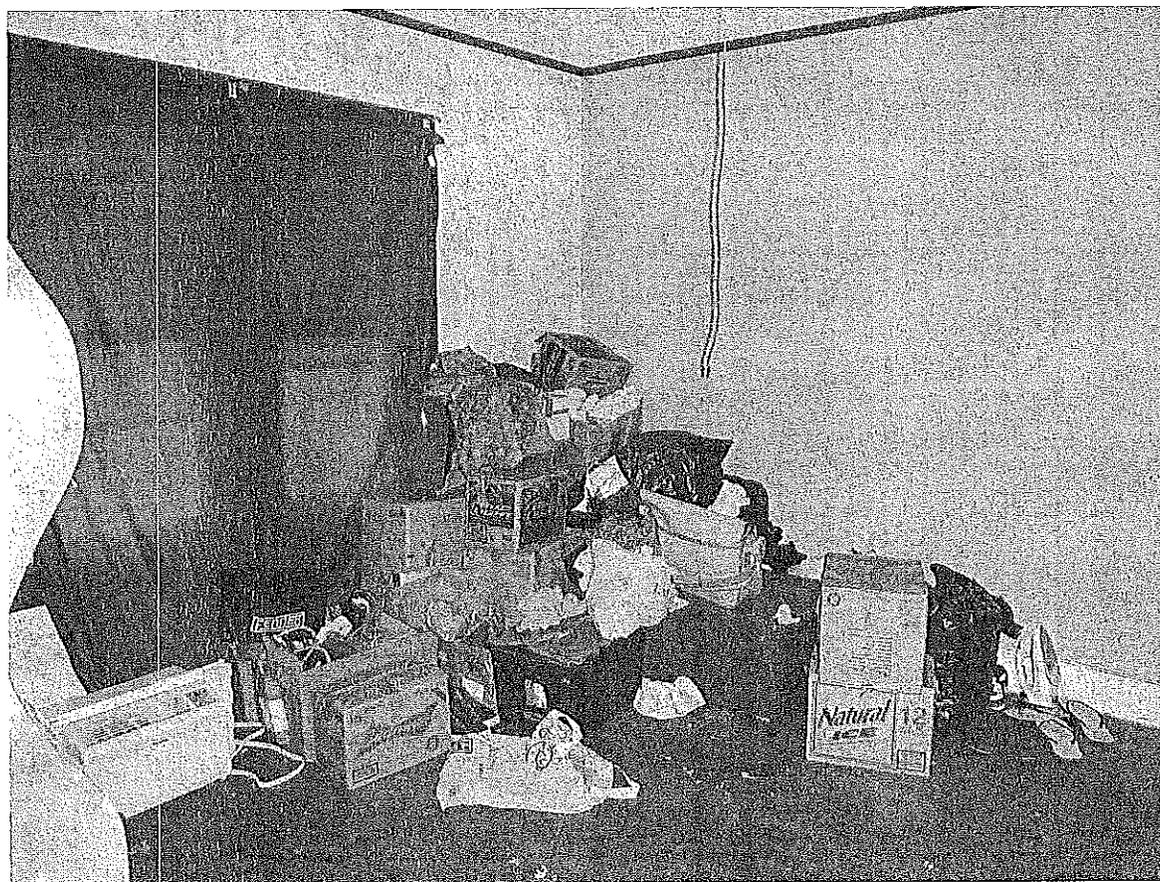
66 Pasadena St, Exterior



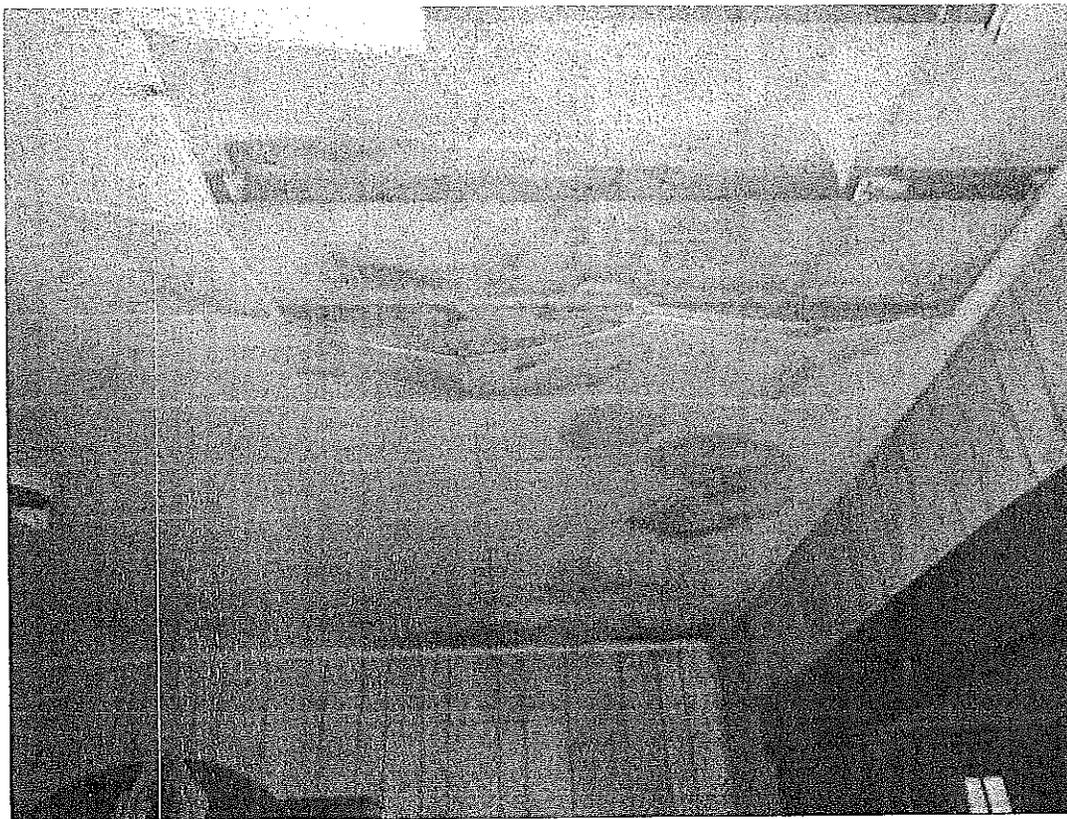
66 Pasadena - Kitchen



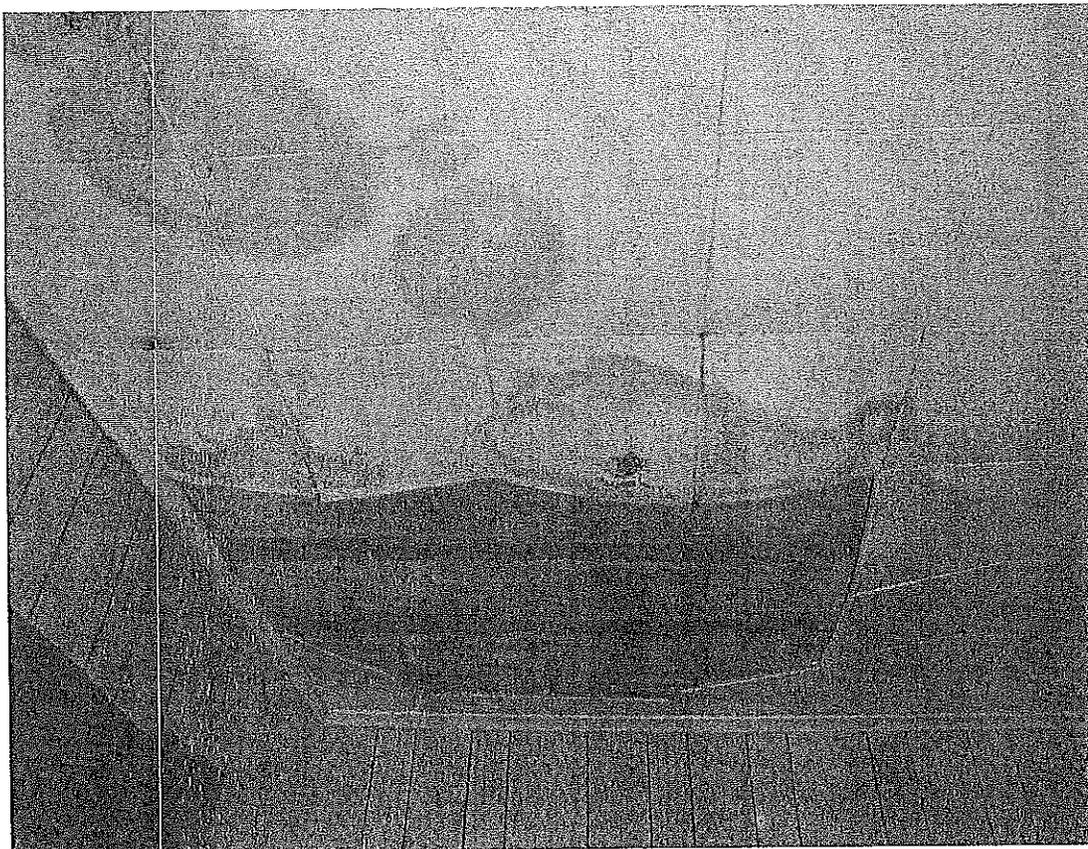
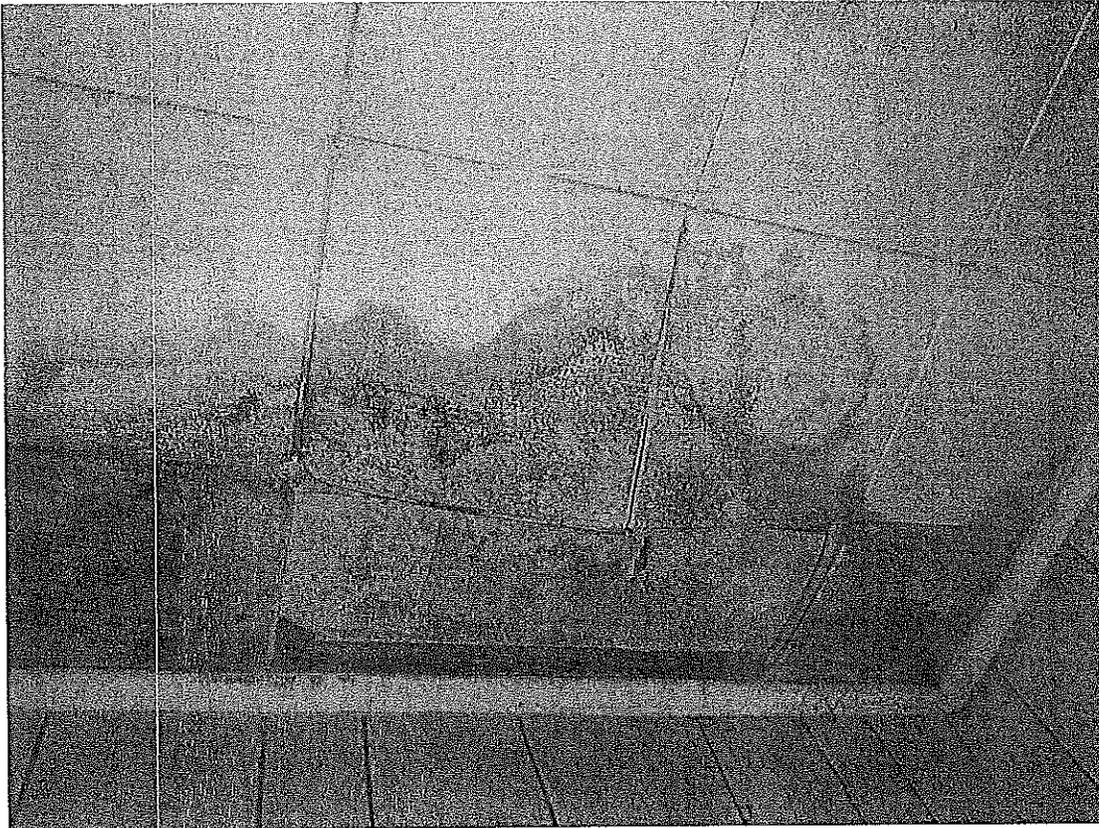
66 Pasadena – Examples of bedrooms being full of trash and in need of paint and floor refinishing.



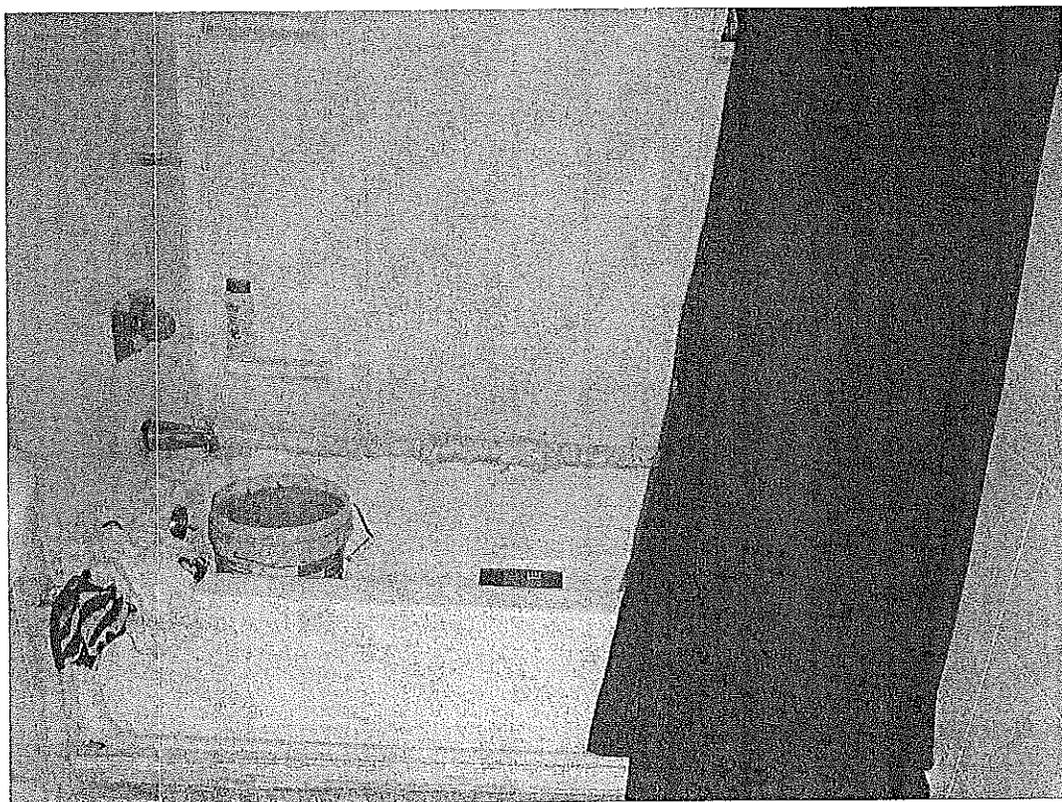
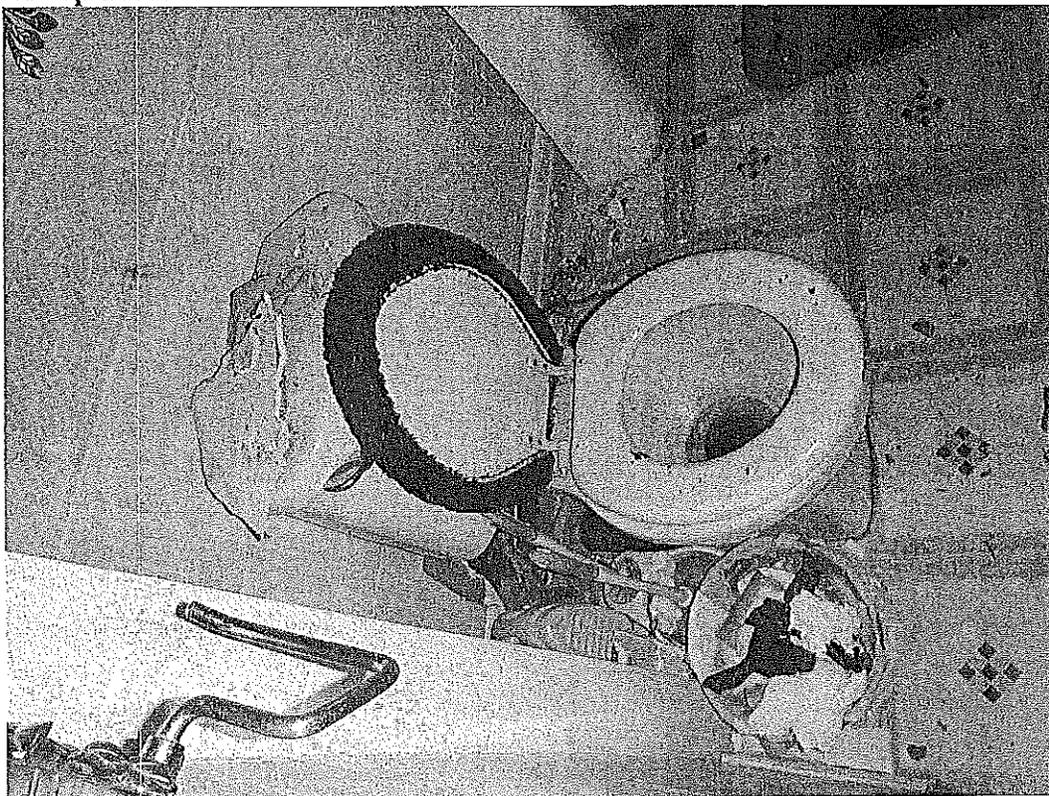
**66 Pasadena – Water Damage – Ceilings throughout the kitchens bathrooms living rooms and dining rooms of both the 1<sup>st</sup> and 2<sup>nd</sup> floor apartments have significant water damage and will need to be gutted and replaced and any mold treated.**



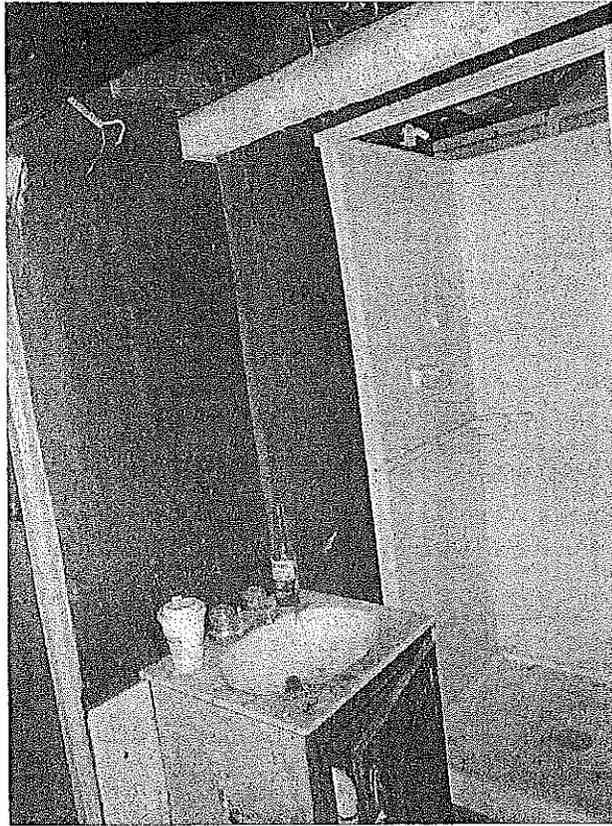
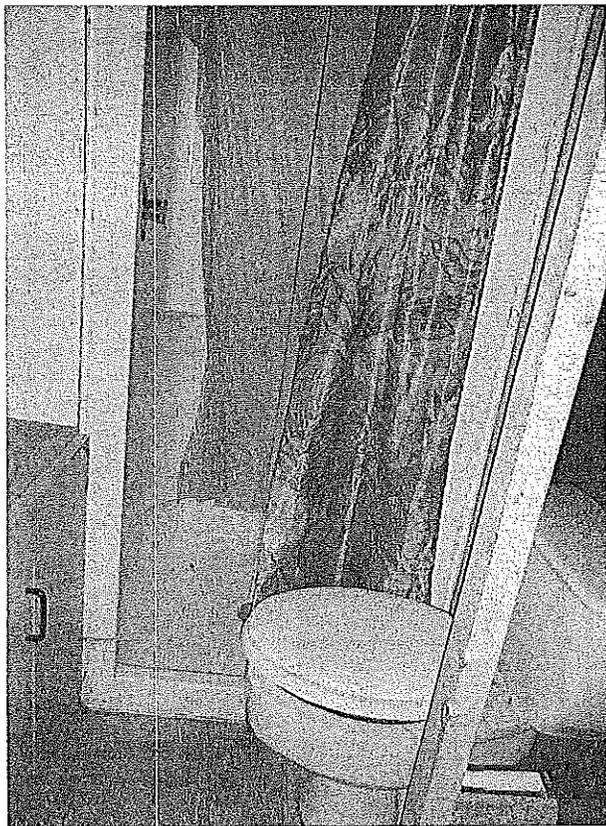
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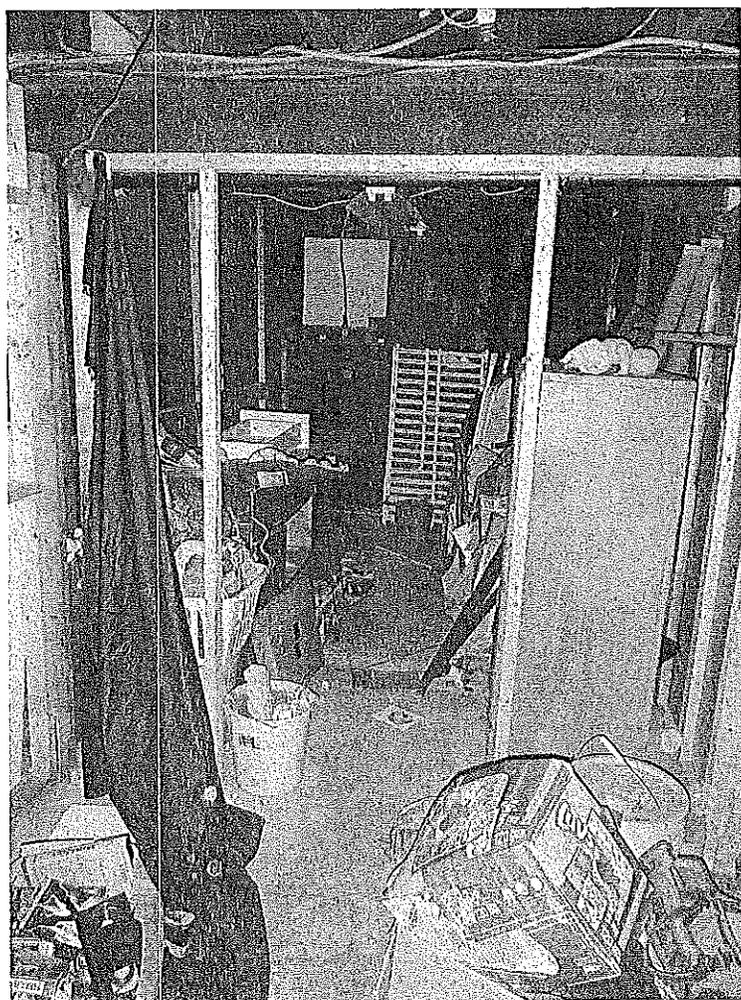
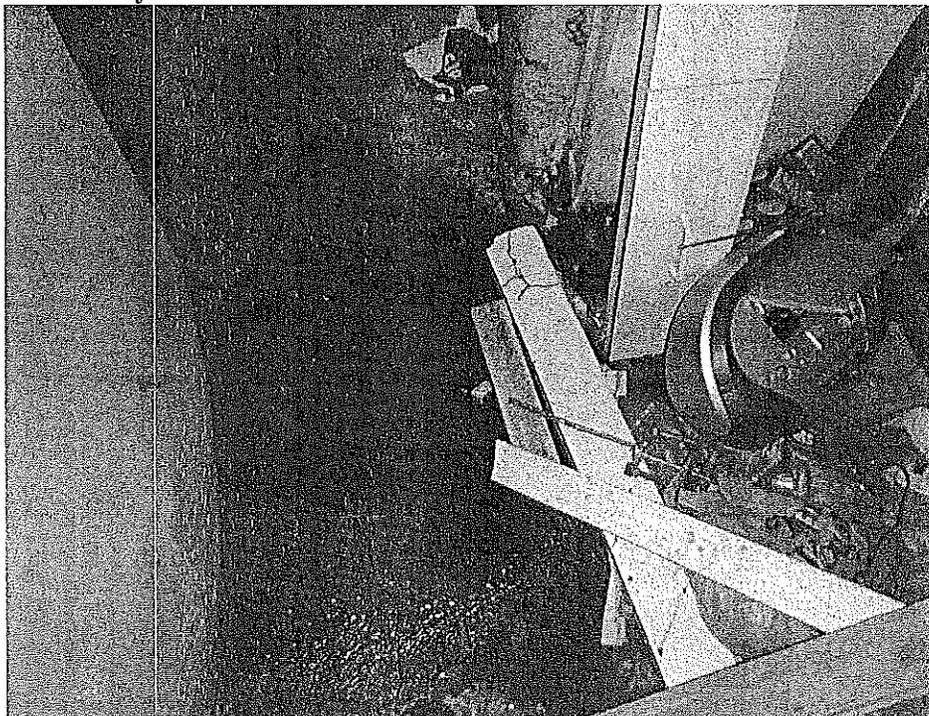
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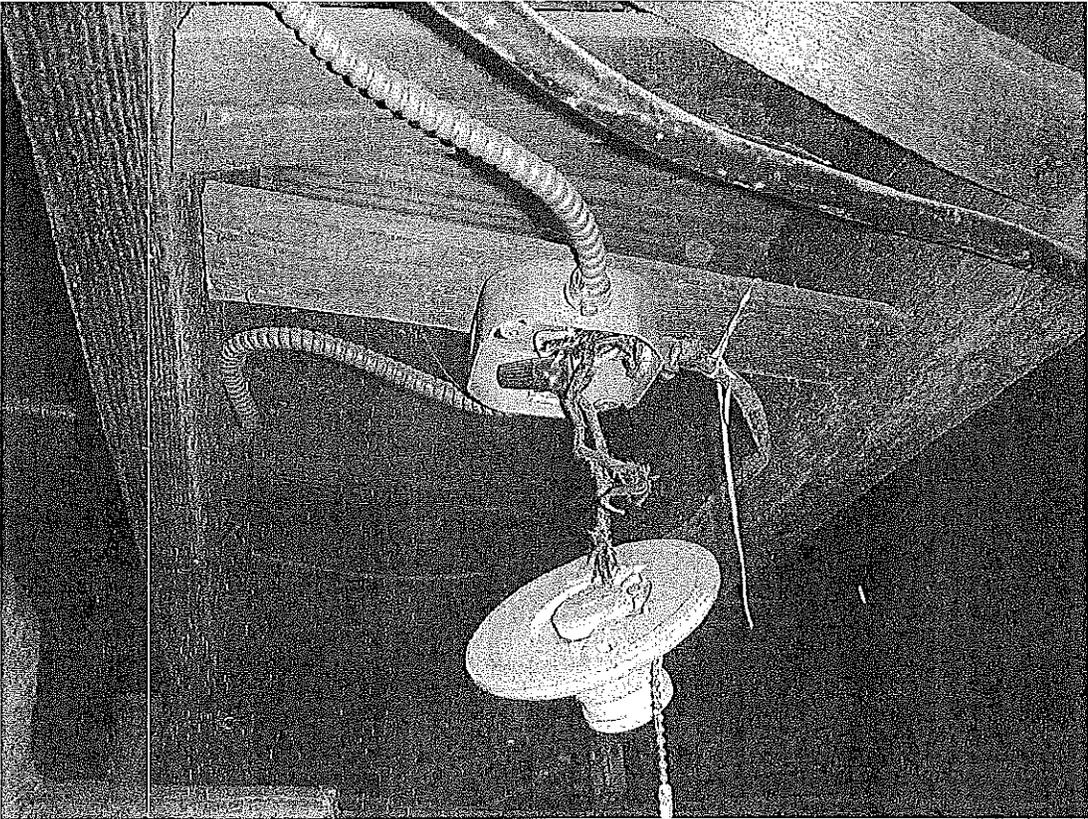
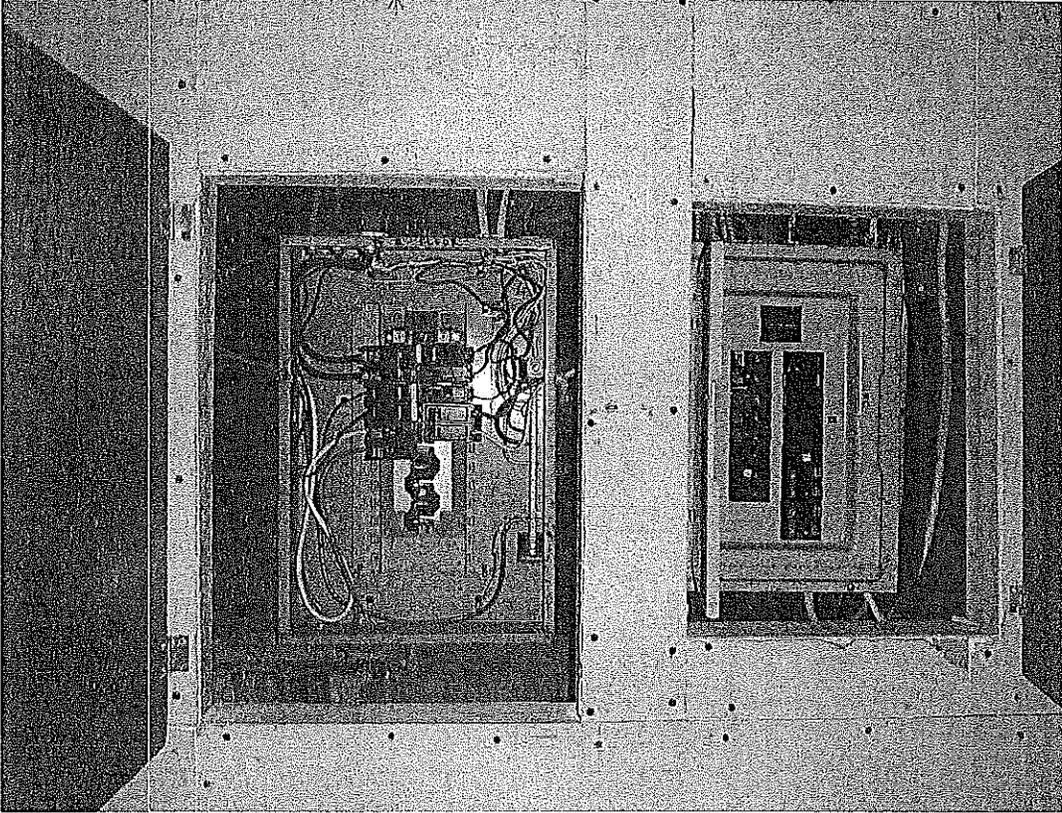
**66 Pasadena – Basement – The basement is full of trash and debris and the remains of two illegal basement apartments. The trash is creating a harborage to vermin as well as creating an unsanitary moldy condition.**



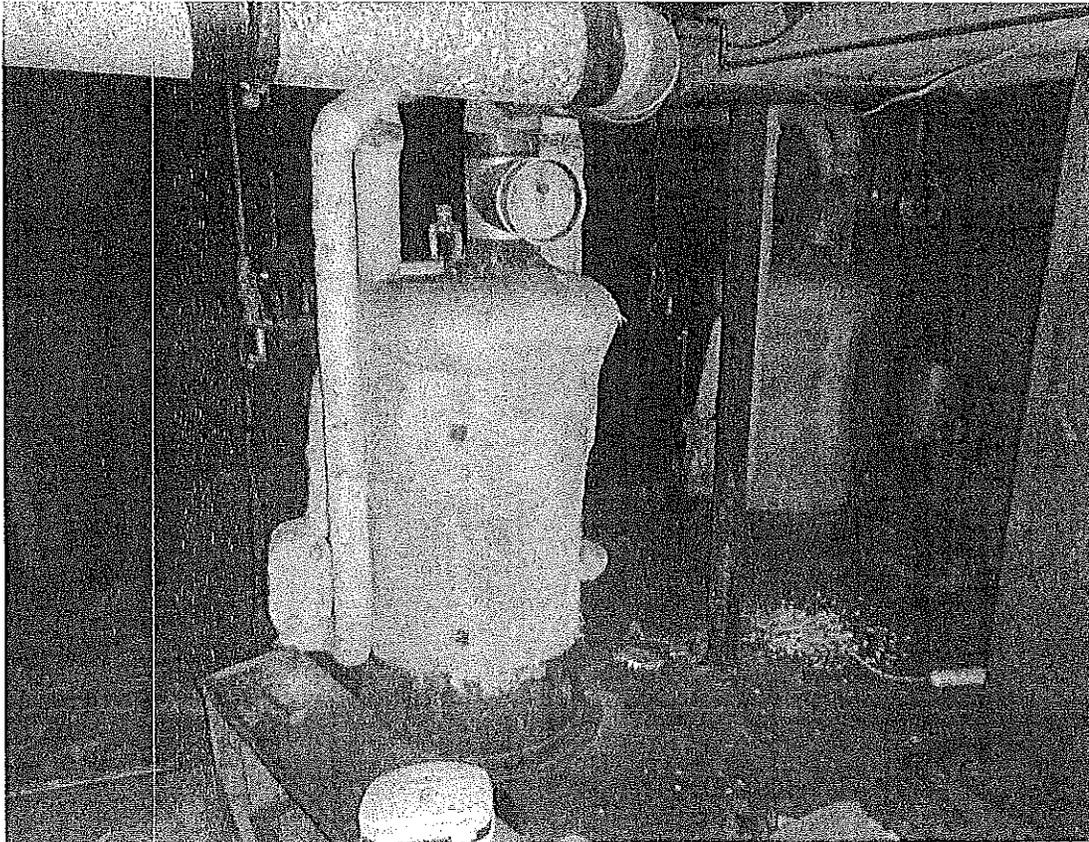
66 Pasadena – Standing water in basement – There is standing water in the basement which is either the result of poor sewer drainage, water leaking in from the room or faulty plumbing. It is creating an unsanitary condition.



66 Pasadena – Electrical System – The electrical system has been tampered with and throughout the house there are exposed wires and panels.



66 Pasadena – Heating Systems & Hot Water Heaters– The heating systems are older obsolete oil fired steam boilers. An evaluation will be made as to whether or not these systems can be serviced or whether replacement is necessary. Hot water heaters will also be tested and replaced as necessary.



66 Pasadent – Roof detail showing deterioration and patched areas.

