

COMMONWEALTH OF MASSACHUSETTS  
TRIAL COURT

SUFFOLK, ss

SUPERIOR COURT DEPARTMENT  
CIVIL ACTION NO. 13-4428-A

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LLOYDS BANK PLC, f/k/a Lloyds TSB Bank plc,  
in its capacity as Facility Agent,

Plaintiff,

v.

SERVICE POINT USA, INC.,

Defendant, and

CITIZENS BANK OF MASSACHUSETTS,

Trustee Process Defendant.

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**MOTION FOR ORDER AUTHORIZING AND DIRECTING TURNOVER BY  
SPECIAL RECEIVER OF CERTAIN COLLATERAL PROCEEDS**

Plaintiff Lloyds Bank, plc, f/k/a Lloyds TSB Bank plc, in its capacity as Facility Agent for certain secured lenders (the "Agent") as creditors of defendant Service Point USA, Inc. ("SPU") pursuant to one or more guarantees of indebtedness given by SPU, and as a secured party holding a valid, perfected, first priority security interest (the "First Lien") in all, or substantially all of the assets of SPU, hereby moves for an order authorizing and directing Francis C. Morrissey, Esq., the court-appointed special receiver of certain of SPU's assets (the "Special Receiver"), to turn over to the Agent the collection proceeds of accounts receivable within the Receiver's possession, custody, and control (the "Collateral Proceeds") that are subject to the First Lien.

After consultation with the Special Receiver concerning this motion, the Agent believes that while the Special Receiver has reserved the right to be heard on this motion, the Agent does not expect the Special Receiver to object to the relief requested herein

For the reasons set forth more fully in the *Memorandum of Law in Support of Motion for Order Directing Turnover by Special Receiver of Certain Collateral Proceeds* filed herewith, the Court should enter an order authorizing and directing the Special Receiver to turnover to the Agent the Collateral Proceeds presently within his possession, custody, and control.

**WHEREFORE**, the Agent respectfully requests that this Court enter an order: (i) authorizing and directing the Special Receiver to turnover to the Agent the Collateral Proceeds; and (ii) granting to the Agent such other and further relief as the Court deems just and proper.

LLOYDS BANK, PLC,  
f/k/a Lloyds TSB Bank, plc,  
in its capacity as Facility Agent,

By its attorneys,



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Dated: March 19, 2014

I HEREBY CERTIFY THAT A TRUE  
COPY OF THE ABOVE DOCUMENT WAS  
SERVED UPON (EACH PARTY APPEARING PRO SE  
AND) THE ATTORNEY OF RECORD FOR EACH OTHER  
PARTY BY MAIL (BY HAND) ON 3/19/14

