COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, ss.

SUPERIOR COURT DEPT OF THE TRIAL COURT Civil Action No.

2484CV00824

ADAM OWENS, ALVIN WALKER, Petitioners,

V.

EDGAR P. BENJAMIN HEALTHCARE CENTER, Respondent.

AFFIDAVIT OF ADAM OWENS

I, Adam Owens, make the following affidavit based on my personal knowledge, under the penalty of perjury that the following is true and correct:

- I am the guardian for my wife who is a resident of the Edgar P. Benjamin Healthcare Center. The facility is located at 120 Fisher Avenue, Boston, Massachusetts.
- After suffering a massive stroke, my wife was in the care of myself and my sons for approximately three years. After deciding that long-term care was the best option for her, we placed her in the Edgar P. Benjamin Healthcare Center.

3. I am petitioning this court as guardian on behalf of my wife for a receivership of the Edgar P. Benjamin Healthcare Center. As guardian, I signed the petition for receivership sent to the Massachusetts Department of Public Health and the Attorney General's Office on or about February 27, 2024, which set forth numerous reasons why receivership is necessary.

Signed under pains and penalty of perjury this 26 day of March 2024.

Idam Over

Adam Owens