

**COMMONWEALTH OF MASSACHUSETTS  
LAND COURT  
DEPARTMENT OF THE TRIAL COURT**

MIDDLESEX, SS.

MISCELLANEOUS CASE  
NO. 20 MISC 000073 (HPS)

Galina Filippova, as Trustee of the	)
PROSPECT STREET REALTY TRUST,	)
Plaintiff,	)
	)
v.	)
	)
FRAMINGHAM ZONING BOARD OF	)
APPEALS, and STEPHEN MELTZER,	)
EDWARD COSGROVE, SUSAN	)
CRAIGHEAD, JOHN MCKENNA,	)
JOSEPH NORTON, HEATHER	)
O'DONNELL, and LAP YAN, as they are	)
the Members of the FRAMINGHAM	)
ZONING BOARD OF APPEALS,	)
Defendants,	)
	)
and	)
	)
Fredric W. Schelong, Trustee of the	)
FREDRIC W. SCHELONG 1997	)
REVOCABLE TRUST,	)
Defendant-Intervenor.	)
	)

**PLAINTIFF GALINA FILIPPOVA'S MOTION FOR SUMMARY JUDGEMENT  
PURSUANT TO MASS. R. CIV. P. 56**

The Plaintiff Galina Filippova, as Trustee of the Prospect Street Realty Trust moves for entry of a final judgment in its favor as a matter of law under Mass. R. Civ. P. 56, annulling the Decision of the Framingham Zoning Board of Appeals, and reinstating the Building Permit. In further support of this Motion, Plaintiff relies on its Memorandum of Law, Plaintiff's Statement of Material Facts, Plaintiff's Land Court Rule 4 Appendix, the Joint Statement of Agreed Facts, and the Joint Appendix accompanying the Motion, as required by Land Court Rule 4.

Respectfully submitted,

Galina Filippova, Trustee of the  
Prospect Street Realty Trust

By her attorneys,



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Dated: July 24, 2020

### CERTIFICATE OF SERVICE

I, Ethan Dively, attorney for the plaintiff, hereby certify that on this 24th day of July 2020, I caused a copy of the foregoing Plaintiff's Motion for Summary Judgment to be served by email, upon the following counsel of record:

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