

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MASSACHUSETTS  
EASTERN DIVISION

In re:  
RMA STRATEGIC OPPORTUNITY  
FUND, LLC,  
Debtor

Case No. 17-13328-FJB  
Chapter 7

**Limited Objection of Raymond K. Montoya, Alma Montoya, Aimee Montoya, Ryan Montoya, Ross Montoya, Raymond Montoya II, and Deepa Bhatt**

Now come interested parties Raymond K. Montoya, Alma Montoya, Aimee Montoya, Ryan Montoya, Ross Montoya, Raymond Montoya II, and Deepa Bhatt (together, the “Montoya Essex Defendants”), through counsel, and hereby make limited objection to the linked Motion to Approve Stipulation. As reasons therefore, counsel states as follows:

1. The Montoya Essex Defendants do not oppose the general character of the compromise proposed by the Motion, but ask that the Court’s order be clear to effectuate the compromise while preserving their rights.
2. The Essex Defendants ask the Court’s order with respect to the Motion be clear as to what is NOT being done by the Court, specifically: 1) That the Court is NOT lifting the automatic stay with respect to any persons or property; 2) That the Court has NOT determined whether the automatic stay is in effect or is not in effect as to any persons or property; 3) That the Court has NOT adjudicated the merits of any claim for violation of the automatic stay.

3. Further, the Montoya Essex Defendants request that the Court order that Owens release any liens, attachments, or preliminary remedies of any kind obtained by Owens against any defendant who is to be dismissed from the Essex Superior Court. Owens attempted to obtain an attachment on real estate owned by Raymond Montoya II and Deepa Bhatt in Chicago, IL; it is not known whether this attempt was successful. There may have been other attempted attachments elsewhere. Owens should release all preliminary remedies of any kind with respect to all dismissed defendants from the Essex County Action.

Dated: Tuesday, October 23, 2018

Respectfully submitted,  
the Montoya Essex Defendants,  
By their attorney,  
/s/ William C. Parks  
William C. Parks (BBO# 679820)  
100 State St, Suite 900, Boston, MA 02109  
Phone: (617) 523-0712; Email: [will@wparkslaw.com](mailto:will@wparkslaw.com)

**Certificate of Service**

I, William C. Parks, undersigned, hereby certify that on this day, October 23, 2018, I served a true copy of this Limited Objection by the Court's CM/ECF system upon the parties listed below:

John Fitzgerald ([USTPRegion01.BO.ECF@USDOJ.GOV](mailto:USTPRegion01.BO.ECF@USDOJ.GOV))

Eric K. Bradford ([Eric.K.Bradford@USDOJ.gov](mailto:Eric.K.Bradford@USDOJ.gov))

Mark G. DeGiacomo ([mdegiacomo@murthalaw.com](mailto:mdegiacomo@murthalaw.com))

Jonathan Horne ([jhorne@murthalaw.com](mailto:jhorne@murthalaw.com))

William R. Moorman, Jr. ([wmoorman@psh.com](mailto:wmoorman@psh.com))

/s/ William C. Parks (BBO# 679820)