


CIVIL ACTION COVER SHEET	DOCKET NUMBER 2484CV0811A	Massachusetts Trial Court Superior Court	
Plaintiff: NeuGen, LLC		Defendant: Massachusetts Mutual Life Insurance Company	
ADDRESS: 33 Nob Hill Road Madison, WI 53713		ADDRESS: 10 Fan Pier Boulevard Boston, MA 02210	
Plaintiff Attorney: Sean Muldowney, Mallarie Simonds		Defendant Attorney:	
ADDRESS: Husch Blackwell LLP One Beacon Street, Suite 1320, Boston, MA, 02108		ADDRESS:	
BBO: Muldowney: 670967; Simonds: 705207		BBO:	
TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)			
CODE NO. A99	TYPE OF ACTION (specify) Breach of contract, investment agreement	TRACK F	HAS A JURY CLAIM BEEN MADE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO
*If "Other" please describe:			
Is there a claim under G.L. c. 93A? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		Is there a class action under Mass. R. Civ. P. 23? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A			
The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. (Note to plaintiff: for this form, do not state double or treble damages, indicate single damages only.)			
TORT CLAIMS			
A. Documented medical expenses to date			
1. Total hospital expenses			
2. Total doctor expenses			
3. Total chiropractic expenses			
4. Total physical therapy expenses			
5. Total other expenses (describe below)			
Subtotal (1-5):			\$0.00
B. Documented lost wages and compensation to date			
C. Documented property damages to date			
D. Reasonably anticipated future medical and hospital expenses			
E. Reasonably anticipated lost wages			
F. Other documented items of damages (describe below)			
TOTAL (A-F):			\$0.00
G. Briefly describe plaintiff's injury, including the nature and extent of the injury:			
CONTRACT CLAIMS			
<input type="checkbox"/> This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement, Mass. R. Civ. P. 8.1(a).			
Item #	Detailed Description of Each Claim	Amount	
1.	Breach of Contract	\$2,791,111.79	
2.	Breach of Duty of Good Faith and Fair Dealing	\$2,791,111.79	
3.	G.L. c. 93A	\$2,791,111.79 + statutory damages	
Total		\$2,791,111.79	
Signature of Attorney/Self-Represented Plaintiff: X <i>[Signature]</i>			Date: March 27, 2024
RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.			

RECEIVED

MAR 27 2024
SUPERIOR COURT - CIVIL
JOHN E. POWERS III
ACTING CLERK MAGISTRATE

CERTIFICATION UNDER S.J.C. RULE 1:10(5)

I hereby certify that I have complied with requirements of Rule 5 of Supreme Judicial Court Rule 1:10 Uniform Rules on Dispute Resolution, requiring that I inform my clients about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.

Signature of Attorney X



Date

3/27/24