

COMMONWEALTH OF MASSACHUSETTS

ESSEX, SS.

PROBATE AND FAMILY  
DEPARTMENT OF THE  
TRIAL COURT  
No. ES09E0094QC

APPEALS COURT  
SINGLE JUSTICE NO.:

ALEXANDER B.C. MULHOLLAND, JR.,  
PETER FOOTE, DONALD WHISTON,  
JAMES FOLEY, ELIZABETH  
KILCOYNE, PATRICK  
J. MCNALLY, and INGRID MILES,  
as they are the Feoffees of the  
Grammar School in the Town of  
Ipswich,

Plaintiffs,

v.  
ATTORNEY GENERAL OF THE  
COMMONWEALTH OF MASSACHUSETTS,  
IPSWICH SCHOOL COMMITTEE, and  
RICHARD KORB, as he is  
Superintendent of Schools in  
the Town of Ipswich,

Defendants.

AFFIDAVIT OF STODDARD M. WILSON IN SUPPORT OF INTERVENERS'  
MOTION TO STAY JUDGMENT

I, Stoddard M. Wilson, being duly sworn depose and say  
as follows:

1. I am a member of the Ipswich Finance Committee.
2. I make this affidavit in support of the Motion to Stay Judgment filed in the Appeals Court by the Applicants for Intervention.
- 3 The statements in this affidavit are of my own personal knowledge and include my personal opinions. I do not represent the Finance Committee.

4. On January 5th, 2012, the Ipswich School Committee convened a meeting for the purpose of presenting the settlement agreement regarding the sale of Little Neck to the public.

5. The rationale for the settlement and the sale of Little Neck was presented to the public by the chairman of the School Committee, Jeff Loeb.

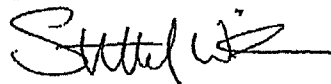
6. I have recently reviewed a verbatim transcription of Mr. Loeb's presentation as to the School Committee's rationale for agreeing to sell Little Neck.

7. Mr. Loeb explained to the public that the trial judge had announced as early as the first day of trial that she wanted to order a sale of Little Neck.

8. I was surprised and disappointed to hear that the sale of land held in trust for the school children of Ipswich for 350 years could be sold at the behest of a trial judge before she even heard any evidence to justify that the land should be sold, or listened to expert testimony regarding the fair market value of the land.

9. I was also dismayed to learn that the language of William Payne instructing that the land at Little Neck remain forever in trust for the benefit of the school children could be so easily discarded by a trial judge without a complete trial and written decision giving reasons why Mr. Payne's will should be re-written.

Signed and sworn under the pains and penalties of perjury  
this 10th day of February, 2012

A handwritten signature in black ink, appearing to read "Stoddard M. Wilson", written over a horizontal line.

Stoddard M. Wilson