

COMMONWEALTH OF MASSACHUSETTS

MIDDLESEX, SS

SUPERIOR COURT DEPARTMENT

SAMANTHA SHINEWALD,

Plaintiff

v.

CAMP SPECIALISTS, LLC

Defendant

RECEIVED

9/17/2021

CA No: 2181 cv 01950

**PROFFERED ASSENT TO ENTRY OF PRELIMINARY INJUNCTION**

CAMP SPECIALISTS, LLC, the defendant in this matter, hereby represents and agrees that:

1. Camp Specialists, LLC, including its officers, agents, servants, employees, and attorneys, represents and agrees that it shall not enforce or take any action to enforce Paragraph 4, the Non-Competition clause of the Independent Contractor Agreement, against Samantha Shinewald, pending the disposition of the plaintiff’s claims in this matter on the merits;
2. this filing may be entered as a Preliminary Injunction under Rule 65(b) of the Superior Court Rules of Civil Procedure; and
3. Camp Specialists, LLC reserves its right to enforce or bring claims under other sections of the Independent Contractor Agreement, its right to respond to the allegations of the Complaint, and all other rights not expressly waived herein.

Camp Specialists, LLC suggests that this Proffered Assent resolves the Motion for Preliminary Injunction filed by the plaintiff on September 7, 2021.

Dated: September 17, 2021

RESPECTFULLY SUBMITTED,

**CAMP SPECIALISTS, LLC**

By its legal counsel,

/s/ Thomas R. Noel

Thomas R. Noel, Esq. (BBO# 556111)

NOEL LAW

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Providence, RI 02903

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**CERTIFICATION**

I hereby certify that on September 17, 2021, I electronically served this document *via* the Court's electronic filing system with notice to all counsel registered to receive service.

/s/ Thomas R. Noel

\_\_\_\_\_  
**So Ordered**

**Entered:** \_\_\_\_\_

**September \_\_, 2021**