

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 06-CA-114xx-xxx
	)	
Dr. Steve B. Patriot, et al.,	)	(Jury Trial Demanded)
	)	
Defendants.	)	

**REQUEST FOR STAY OF JUDGMENT OF LIEN FORECLOSURE**

Pursuant to Federal Rules of Civil Procedure 62(b)(f)(h), Defendants Dr. Steve B. Patriot and Deborah B. Patriot request that this Court stay enforcement and execution of the Rule 54(b) Judgment of Foreclosure rendered dated August 17, 2007.

The reasons for this request are as follows:

1. The property subject to foreclosure at 236 Glen Road, Weston Massachusetts, in addition to serving as the Patriot Defendants' residence, serves as the full-time business location for Defendant Dr. Steve B. Patriot and part-time business location for Defendant Deborah B. Patriot. Both Defendants provide psychotherapeutic consultation and treatment services to children, adolescents and adults, many of whom receive services in connection with life-threatening physical illnesses as well as significant psychiatric disorders.

2. Notwithstanding the successful reversal of the order of foreclosure through the appeal process, a rapid or precipitous move would unquestionably have a deleterious impact on the emotional stability of individuals who are, by virtue of their illnesses and psychiatric disorders, vulnerable and impaired in their adaptive functioning.
3. The task of locating office space within a reasonable geographic radius of our patient population and which provides the appropriate space needed to conduct child psychotherapy (i.e. play therapy) will require considerable time and effort.
4. Additionally, preparing patients for transfer either to newly acquired office space or, as necessary, to new healthcare providers will also require thoughtful and time-consuming therapeutic planning so as to minimize the potential for catastrophic reactions.
5. Foreclosure at this time would require the Patriot Defendants to locate and secure both residential and professional environments. Since we are representing ourselves *pro se* in these proceedings, our ability to provide adequate and effective representation through the reconsideration and appeal

process would undoubtedly be compromised by the impact of immediate foreclosure action.

We, therefore, humbly prevail upon the Court to exercise its discretionary power to ameliorate and prevent harm to our patient population and to enable us to prepare and to present Motions for Reconsideration and, if necessary, Appeal.

*Pro se*, for Defendant Dr. Steve B. Patriot

*Pro se*, for Defendant Deborah B. Patriot

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Dr. Steve B. Patriot

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Deborah B. Patriot

**Certificate of Service:** We hereby certify that on this date, we sent a copy of this response to opposing party by e-mail, as requested.

August 24, 2007

Dr. Steve B. and Deborah Patriot  
1776 Patriot Way  
Weston, MA