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STATE OF INDIANA) IN THE MARION SUPERIOR COURT
COUNTY OF MARION)) CAUSE# 49D04-1909-MF-040456)
PNC Bank, National Association Plaintiff(s)) .))
VS.))
HELEN L. CHANDLER et al. Defendant(s))))
BOX SUITES LLC Intervener)))

MOTION FOR INTERVENTION

Comes now BOX SUITES LLC, applicant for intervention, by counsel, and pursuant to

TR24

states the following:

- 1) That pursuant to Rule 24. Intervention
- (A) Intervention of right. Upon timely motion anyone shall be permitted to intervene in an action:
- (1) when a statute confers an unconditional right to intervene; or
- (2) when the applicant claims an interest relating to a property, fund or transaction which is the subject of the action and he is so situated that the disposition of the action may as a practical matter impair or impede his ability to protect his interest in the property, fund or transaction, unless the applicant's interest is adequately represented by existing parties.

2) That applicant claims an interest by virtue of acquiring right to the surplus proceeds of the sheriff sale.

Wherefore applicant prays that it be allowed to intervene in the above referenced

litigation.

SCOTT RICHARDS #19871-49 8465 KEYSTONE XING #212 INDIANAPOLIS IN 46204 317/859-5666

CERTIFICATE OF SERVICE

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I hereby certify that on March 15, 2023, I electronically filed the foregoing documents using the Indiana E-Filing System. I further certify that these documents were mailed to the Defendant(s) on <u>March 15, 2023</u>

MATTHEW STEPHENS LOVE

KEITH W. LERCH

JAMES GAINES; c/o Amanda Whipple PO BOX 47966 INDIANAPOLIS IN 46247

LISA SHARKEY 7960 AUSTRIAN PINE DRIVE INDIANAPOLIS IN 46268

Scott Richards