

Portland, Maine



Yes. Life's good here.

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February 22, 2017

**VIA HAND-DELIVERY**

Beth Alward  
Assistant Clerk, Unified Criminal Division  
Cumberland County District Court  
142 Federal Street  
Portland, Maine 04101

**RE:** Proposed Order on City's Motion to Enforce Order and Judgment  
*City of Portland v. Raj & Raj, LLC*  
Docket No. VI-15-453

Dear Beth,

As Judge Kelly requested, I am writing to provide an update on the status of the violations in the above captioned matter, as well as a revised proposed order. As of last week, Raj & Raj, LLC had not installed all of the required fire doors at 27-29 State Street. In accordance with their usual habits, they have ignored my correspondence requesting a time frame to complete the work.

As such, I am attaching a revised order on the City's Motion to Enforce Order and Judgment. I am happy to email this to you in Word version if Judge Kelly would like to make edits to the order.

Thank you for your assistance with this matter, and please feel free to contact me if you need anything further.

Sincerely,



Anne M. Torregrossa

Enclosure

STATE OF MAINE  
CUMBERLAND, ss

DISTRICT COURT  
Portland  
Docket No. VI-15-453

CITY OF PORTLAND,

Plaintiff,

v.

RAJ & RAJ LLC,

Defendant.

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**ORDER ON MOTION TO ENFORCE  
JUDGMENT AND ORDER**

The City of Portland (the “City”) filed a joint Motion for Contempt and Motion to Enforce Judgment and Order in this matter. On January 9, 2017, with the agreement of the parties, this Court took testimony only on the Motion to Enforce. Upon consideration of the City of Portland’s Motion to Enforce Judgment and Order, and after opportunity for Defendant to be heard, this Court hereby FINDS:

1. That this Court’s Judgment and Order, issued on May 23, 2016 (the “Order”) was correct and lawful, at least with respect to its finding that Defendant had failed to install required fire doors in violation of the City of Portland Code of Ordinances.
2. The Order was also correct and lawful to the extent that it ordered Defendant to provide the City a plan of action to install the fire doors; correct the violations; and pay to the City civil penalties in the amount of \$17,200 for the fire door violations (the “Civil Penalties”).
3. Defendant has failed to comply with this Court’s lawful Judgment and Order (the “Order”), issued on May 23, 2016.

4. Specifically, Defendant has failed to provide the City an acceptable Plan of Action for installing the required fire doors; has failed to remedy those violations; and has failed to pay the City the Civil Penalties awarded in the Order.

Therefore, this Court hereby ORDERS:

- A. Defendant shall install all required fire doors, to the satisfaction of the City, at the property known as 27-29 State Street in Portland, Maine no later than 10 days from the date of this order.
- B. Defendant shall pay to the City the Civil Penalties awarded in the Order no later than 10 days from the date of this order.
- C. Defendant shall pay to the City additional Civil Penalties in the amount of \$100 per day from the date of the Order until today's date, totaling \$27,500.00, no later than 10 days from the date of this order.
- D. Within 10 days of the date of this order, Defendant shall provide a copy of this order to all tenants at 27-29 State Street and shall provide proof that it has done so to the City.

Dated:

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Judge, District Court