

DOCKET NO.: FBT-FA19-6088163-S : SUPERIOR COURT

CHRISTOPHER AMBROSE : JUDICIAL DISTRICT of FAIRFIELD

V. : AT BRIDGEPORT

KAREN AMBROSE : AUGUST 23, 2021

MOTION TO INTERVENE

The movant herein, Law Offices of Edward Nusbaum, PC hereby moves pursuant to Conn. Gen. Stat §52-102 and Connecticut Practice Book §9-6 that it be permitted to intervene in the captioned matter for purposes of filing and prosecuting a motion for contempt as to the Defendant, Karen Ambrose. In support thereof the movant states the following:

1. The movant in a law firm that represented the Defendant, Karen Ambrose aka Karen Riordan in this case.
2. On or about August 27, 2020, the Defendant Karen Ambrose terminated the movant's representation.
3. The Defendant has an outstanding balance due to the Plaintiff for legal fees and expenses of Sixty-four thousand- Eight hundred and nine no/100 (64,809.00) dollars.

**ORAL ARGUMENT REQUESTED-
NO TESTIMONY REQUIRED.**

4. On July 29, 2020 the Defendant, Karen Ambrose entered into a stipulation which was entered as an order of the court which provided in pertinent part to a sale and disbursement of the closing proceeds from the parties martial name (Exhibit A).

5. On September 2, 2020 the court, Grossman ordered the parties to comply with and adhere to the stipulation (Copy of the transcript in attached hereto as Exhibit B).

6. The Defendant, Karen Ambrose has refused and neglected to comply with the court order.

7. The intervenor is currently holding in escrow the proceeds of the sale to pay its legal fees.

8. The intervenor has standing to intervene in that it has a direct monetary and pecuniary interest in this matter.

9. The proposed intervenor intends to file a motion for contempt against the Defendant for and on account of her failure to comply with the stipulation and the order of the court.

WHEREFORE the proposed third-party Plaintiff moves that it be given permission to intervene in this case for the purposes of filing motion for contempt to protect its monetary and pecuniary interests.

**ORAL ARGUMENT REQUESTED-
NO TESTIMONY REQUIRED.**

PROPOSED THIRD PARTY,
LAW OFFICES OF EDWARD NUSBAUM, PC.

By: 

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