

**- LEGAL NOTICE -**



**COMMONWEALTH OF MASSACHUSETTS  
LAND COURT DEPARTMENT  
TRIAL COURT**

**SUFFOLK, SS.**

**CASE NO. 25 MISC 000412 (GHP)**

***JONATHAN ARIAS***

***V.***

***UNKNOWN HEIRS OF THE ESTATE OF JOHN G. CANTLON, SR., ET AL.***

**To:** John G. Cantlon, Sr., deceased, formerly of Fort Myers, Lee County, Florida; Edward P. Cantlon, Sr., deceased, formerly of Oldsmar, Pinellas County, Florida, or their unknown heirs, devisees, or legal representatives.

You are hereby notified that a complaint has been filed by the above-named Plaintiff in which you are named as an interested party. This complaint concerns a certain parcel of land in Revere, Suffolk County, and said Commonwealth being known as and numbered 18 Neponset Street ("Property"). The Property was conveyed to Elizabeth Cantlon in 1940. The deed conveying the Property described the Property as "being Lots 188 and 189 on Plan of Ocean Park dated August 14, 1906" ("1906 Plan"). Plaintiff contends that in 1990, John Cantlon and Edward Cantlon, heirs of Elizabeth Cantlon and then-owners of the Property, executed a land swap ("Land Swap") with the abutting property owner at 22 Neponset Street, Revere, Massachusetts ("Abutting Property"), Thomas Duffy III. In deeds reflecting the swap, the owners of 18 and 22 Neponset Street traded ownership of 36 feet of their respective properties. Plaintiff maintains that the next conveyance of the Property, on January 31, 1995 to Katherine Cantlon, was accomplished by a deed ("1995 Deed") that erroneously described the Property solely by reference to the 1906 Plan and which did not reflect the Land Swap. On November 7, 2008, Katherine Cantlon conveyed the Property to herself and Virginia Profumo as joint tenants by a deed ("2008 Deed") that also described the Property solely by reference to the 1906 Plan. Both the 1995 Deed and 2008 Deed failed to describe the Property as it existed after the Land Swap of 1990. Plaintiff reports that subsequent deeds in the chain of title accurately describe the Property. Plaintiff reports that in 2014, the mortgagee of the Abutting Property, Bank of New York Mellon, obtained a corrective plan ("2014 Plan") of the Abutting Property which reflected the Land Swap. Bank of New York Mellon also obtained a judgment from the Suffolk Superior Court reforming the deeds to the Abutting Property which also had omitted references to the Land Swap. Plaintiff further maintains that on March 21, 2023, Katherine Cantlon and Virginia Profumo deeded the Property to Bell Point, LLC, by deed which accurately described the Property by reference to the 2014 Plan. On October 3, 2023, Bell Point, LLC conveyed the Property to Zepaj Development LLC by deed which also accurately described the Property by reference to the 2014 Plan. Plaintiff seeks declaratory judgment reforming both the 1995 Deed and the 2008 Deed to accurately describe the Property by reference, inter alia, to the 2014 Plan.

This complaint may be examined at the Land Court, Boston, Massachusetts, or online at [www.masscourts.org](http://www.masscourts.org). Information on how to search Land Court dockets is available on the Land Court website: [www.mass.gov/how-to/find-a-land-court-case-docket](http://www.mass.gov/how-to/find-a-land-court-case-docket). A copy of said complaint may also be obtained from plaintiff's attorney.

If you intend to make any defense, you are hereby required to serve upon the plaintiff's attorney, Amie D. Joseph, Esq. of First American Law Group, 250 First Avenue, Suite 104, Needham, MA 02494, an answer to the complaint on or before the twenty-second day of September, 2025, next, the return day, hereof, and a copy thereof must be filed in this court on or before said day.

If you fail to do so, judgment by default will be taken against you for relief demanded in the complaint. Unless otherwise provided by Rule 13(a), your answer must state as a counterclaim any claim which you may have against the plaintiff which arise out of the transaction or occurrence that is the subject matter of the plaintiffs' claim, or you will thereafter be barred from making such claim in any other action.

It is ORDERED that notice be given by publishing a copy of this notice once in the following newspapers: (1) the Revere Advocate, a newspaper of published in Revere, Suffolk County, and said Commonwealth and (2) the Tampa Bay Times, a newspaper published in Tampa, Florida, at least thirty days before the twenty-second day of September, 2025.

**Witness, Gordon H. Piper, Chief Justice of the Land Court, the eighth day of August, 2025.**

**Attest:**

**Deborah J. Patterson  
Recorder**

**August 15, 2025**