

Docketed 11/12/2025

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

NORFOLK, ss.

Civil Action No. 2382CV00389

K.F., a Minor, by his Legal Guardian, Sandra Fernandez,
Filed Under Special Appearance and Reservation of Rights,
Movant,

v.

MARINA BAY RESIDENCES, LLC, BOZZUTO
MANAGEMENT CO., and DELANEY BARRETT,
Defendants,

NOTICE OF ACTIVE INSURANCE AND LENDER INVESTIGATIONS, 2023
FINANCIAL DISCLOSURES, AND PROTECTIVE-ORDER MISCONDUCT

Sandra Fernandez, appearing pro se and as mother and next friend of minor K.F., respectfully submits this Notice to preserve the record and to place the Court, the parties, and all affiliated institutions on formal notice of active investigations and material events directly affecting these proceedings.

1. Active Investigations.

There are ongoing investigations by insurance carriers, including Zurich North America and Gallagher Bassett Services, regarding possible nondisclosure of material facts by Marina Bay Residences LLC, Bozzuto Management Company, and affiliated entities. These inquiries concern alleged construction defects, undisclosed injury

incidents, and the financing of major remedial work performed between 2021 and 2024 while tenants, including minor K.F. remained in occupancy.

2. Lender and Investor Disclosures.

Upon information and belief, in 2023, Marina Bay Residences LLC and related entities executed amendments and reaffirmations of their loan agreements with Truist Bank while these unresolved issues were known to them and while litigation was active. Those reaffirmations allegedly did not disclose the true scope or cost of the remediation work (believed to exceed \$40 million) or the existence of injury claims. The undersigned is in communication with the lender's trust department and certain investor representatives, who have been advised of these concerns and are reviewing the matter.

3. Protective Order and Attorney Conduct.

Attorney Jonathan Sweet, while serving as counsel for Plaintiff Dany Abouelkhier, sought and obtained a protective order that concealed the defendants' financial and insurance information. Upon information and belief, this order primarily benefited the defendants and hindered his own client's discovery rights. Mr. Sweet later participated in or facilitated the severance of Mr. Abouelkhier's claims, effectively shielding those same financial materials from further scrutiny. The protective-order process, combined with the failure to move for class certification, appears to have prevented the triggering of insurance coverage that would otherwise have benefited the injured tenants. Jonathan Sweet and Keches law have been sued for Malpractice and have others lawsuits for this matters being filed in state and federal court very soon. If proven Attorney Sweet risk civil and criminal liability. Whoever aids, abets, counsels,

commands, induces, or procures the commission of an offense is punishable as a principal. I will remind this court, Jonathan Sweet not only pressured his client to sign an unlawful protective order but also continuously pressured his client to drop claims against Marina bay residences LLC and help them to sue Callahan. Stated via email. Sweet helped with Mirrored motions with Marina bay residences LLC to sever his only client and only plaintiff an act that benefited Marina bay residences LLC, right before a protective order needed to be signed. Jonathan Sweet should be DISBARRED.

4. Condition of Property.

The building's condition continues to deteriorate. Reports of leaks, mold, and structural deficiencies persist, and the property's market value has diminished. Any lender, insurer, or investor relying on outdated valuations or certifications may be operating on materially inaccurate information.

5. Notice of Record Distribution.

Copies of this Notice, together with relevant docket filings, are being transmitted to Zurich, Gallagher Bassett, Truist Bank, and other financial or regulatory entities for their independent review. The undersigned is cooperating fully with these institutions and will continue to provide them with documents as investigations proceed.

6. Judicial Notice.

Should this Court proceed to consolidate these cases, approve a "global settlement," or enter any order that prejudices the rights of the undersigned, minor K.F., or similarly situated individuals while such investigations remain open, it will raise serious questions about the appearance of impropriety and the integrity of the judicial process.

7. Purpose of Filing.

This filing does not accuse any specific individual of criminal conduct. It serves as a formal preservation of the record and a notice of ongoing investigations into alleged insurance and bank-disclosure irregularities so that no party or institution may later claim ignorance of the facts now documented.

Respectfully submitted,

K.F., a Minor, by his Legal Guardian, Sandra Fernandez,
Filed Under Special Appearance and Reservation of Rights,
Movant,

550 Liberty St. Unit 905
Braintree, MA 02184

Tel: (617) 806 6566

Email: sandreva14@yahoo.com

Date: November 1st, 2025

By: Sandra Fernandez

On Behalf of K.F., a Minor, as his Legal Guardian, Pro Se,
Filed Under Special Appearance Only

/s/ Sandra Fernandez
Sandra Fernandez

CERTIFICATE OF SERVICE

I hereby certify that on November 1st, 2025 a copy of the foregoing was served electronically on all counsel of record.

DEFENDANT,
MARINA BAY RESIDENCES, LLC,
BY ITS ATTORNEYS,

Daniel P. Dain, BBO# 632411
Kate Moran Carter, BBO# 663202
Dain, Torpy, Le Ray, Wiest & Garner, P.C.
ddain@daintorpy.com
kcarter@daintorpy.com

Gregory P. Sapire (*Pro Hac Vice*)
Raj Aujla (*Pro Hac Vice*)
Maynard Nexsen P.C.
gsapire@maynardnexsen.com
raujla@maynardnexsen.com

DEFENDANTS,
BOZZUTO MANAGEMENT CO. and DELANEY BARRETT
BY THEIR ATTORNEYS,

Ted Papadopoulos, BBO# 671506
AMPS Law, P.C.
ted@ampslaw.com.

James Bragdon (*Pro Hac Vice*)
Gallagher Evelius & Jones LLP
Sangita Kannan (*Pro Hac Vice*)
jbragdon@gejlaw.com
skannan@gejlaw.com

SUBSTITUTED PLAINTIFF,
BETH MATERNA BY HER ATTORNEY
Jonathan D. Sweet, Esq.
Keches Law Group P.C.
jsweet@kecheslaw.com

PRO SE LITIGANT
Dany Abouelkhier
danytaw@yahoo.com

PRO SE LITIGANT

By: Sandra Fernandez, Legal Guardian of K.F., a Minor
Filed Under Special Appearance and Reservation of All Rights,
Petitioner,

/s/ Sandra Fernandez
Sandra Fernandez