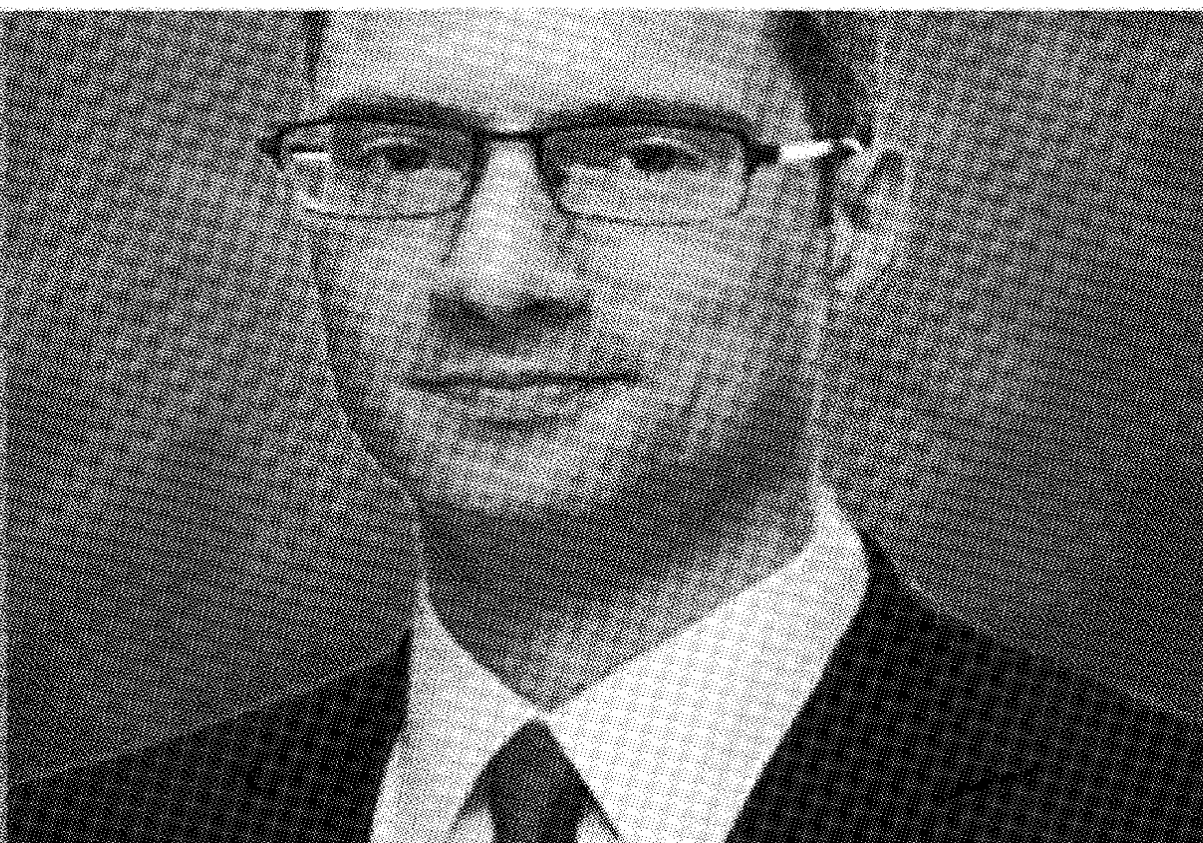


RIVER STREET
LAW



EDUCATION

B.A., Boston College, magna cum laude (2010)

J.D., Boston College Law School (2013)

BAR ADMISSIONS

Massachusetts, November 2013

COURT ADMISSIONS

United States District Court for the District of

Massachusetts, October 2018



RIVER STREET
LAW



Alexander W. Levine

Principal

Alexander's comfort and experience in the courtroom enables him to handle complex civil litigation matters and to appropriately advise River Street Law's clients on how to avoid lengthy disputes before they proceed to litigation. He provides representation to condominium and HOA boards in document amendment and enforcement matters, as well as various real estate and construction related issues and contract disputes. He also represents property owners and condominium unit owners in addressing real estate and construction related disputes, as well as navigating the specifics of condominium law. Alexander's practice also includes transactional and



RIVER STREET
LAW



River Street Law provides litigation and lawsuit services to its clients in the fields of condominium (condo) law, real estate law, and construction law. Litigation Attorney Alexander Levine is licensed to practice in all Massachusetts state courts, which include Massachusetts Superior Courts, Land Court, Housing Courts, and District Courts, as well as the United States District Court for the District of Massachusetts. As a lawsuit attorney, Attorney Levine has successfully argued lawsuits before the Massachusetts Appeals Court and the Massachusetts District Court Appellate Division. River Street Law applies the same level of attention and preparation for any court proceeding or lawsuit, whether it be a Small Claims Trial or an oral argument for an Appeal.

2454CV02931 Abouelkhier, Dany vs. Virtual Fulfillment Center, LLC et al

Case Type: Equitable Remedies
Case Status: Open
File Date: 11/07/2024
DCM Track: F - Fast Track
Initiating Action: Injunction
Status Date: 11/07/2024
Case Judge:
Next Event:

All Information

Party Information

Abouelkhier, Dany - Plaintiff

Alias

Party Attorney

Attorney: Pro Se

Bar Code: PROPER

Address

Phone Number

More Party Information

Virtual Fulfillment Center, LLC - Defendant

Alias

Party Attorney

Attorney: Levine, Esq., Alexander W

Bar Code: 688231

Address: River Street Law
11 River St
Suite 301

CIVIL ACTION COVER SHEET		DOCKET NUMBER	Trial Court of Massachusetts The Superior Court	2
Plaintiff: DANNY AROCKCHIER		Defendant: WIP TWA ENVIRONMENT CENTER	COUNTY: WELLESLEY	
Address: 530 GREY STREET UNIT 905 BOSTON MA 02118		Address: 11 RIVER STREET SUITE 301 WELLESLEY MA 02158		
Plaintiff Attorney: PRO SE		Defendant Attorney: ALAN KASSEM		
Address: PRO SE		Address: 313 W. GLENDALE AVE WELLESLEY MA 02158		
DOB: PRO SE		DOB: PRO SE		
TYPE OF ACTION AND TRACK DESIGNATION (see instructions section on next page)				
CODE NO. 003	TYPE OF ACTION (specify) Injunction	TRACK F	HAS A JURY CLAIM BEEN MADE? ☐ YES ☒ NO	
"If 'Other' please describe: _____				
Is there a claim under G.L. c. 93A?				
☐ YES ☒ NO				
Is there a class action under Mass. R. Civ. P. 23?				
☐ YES ☒ NO				
STATEMENT OF DAMAGES REQUIRED BY G.L. c. 212, § 3A				
The following is a full, itemized and detailed statement of the facts on which the undersigned plaintiff or plaintiff's counsel relies to determine money damages. (Note to plaintiff: for this form, do not state double or treble damages; indicate single damages only.)				
TORT CLAIMS				
A. Documented medical expenses to date				
1. Total hospital expenses _____				
2. Total doctor expenses _____				
3. Total chiropractic expenses _____				
4. Total physical therapy expenses _____				
5. Total other expenses (describe below) _____				
Subtotal (1-5): \$0.00				
B. Documented lost wages and compensation to date _____				
C. Documented property damages to date _____				
D. Reasonably anticipated future medical and hospital expenses _____				
E. Reasonably anticipated lost wages _____				
F. Other documented items of damages (describe below) _____				
TOTAL (A-F): \$0.00				
G. Briefly describe plaintiff's injury, including the nature and extent of the injury:				
CONTRACT CLAIMS				
☐ This action includes a claim involving collection of a debt incurred pursuant to a revolving credit agreement. Mass. R. Civ. P. 8.1(a).				
Item #	Detailed Description of Each Claim	Amount		
1.	PRO EX PARTE & PRELIMINARY INJUNCTION			
Total				
Signature of Attorney/Self-Represented Plaintiff: X				
Date: 11/07/24				
RELATED ACTIONS: Please provide the case number, case name, and county of any related actions pending in the Superior Court.				
CERTIFICATION UNDER S.J.C. RULE 1:18(b)				
I hereby certify that I have complied with requirements of Rule 5 of Supreme Judicial Court Rule 1:18 Uniform Rules on Dispute Resolution, requiring that I inform my clients about court-connected dispute resolution services and discuss with them the advantages and disadvantages of the various methods of dispute resolution.				
Signature of Attorney: X				
Date: _____				

Event Result: Hearing on

Preliminary Injunction scheduled
on:

11/14/2024 02:00 PM

Has been: Held as Scheduled
Hon. Robert L Ullmann,
Presiding

11/19/2024 Endorsement on Motion for
Temporary Restraining Order
and Preliminary Injunction (#1.0):
DENIED
without Prejudice to plaintiff's
right to seek relief after
11/18/2024 for reasons set forth
on the record (Ullmann, J.,)
entered 11/14/2024 notice sent
11/19/2024

02/11/2025 Answer with a counterclaim

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Image

Applies To: Virtual Fulfillment
Center,LLC (Defendant);
Kassem, Mohamed (Defendant);
Neamatalla, Omar (Defendant);
Ali, Mohamed (Defendant);
Kasem, Ahmed (Defendant)

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS

SUPERIOR COURT DEPARTMENT
DOCKET NO.: 2484CV02931-H

DANY ABOUELKHIER,
Plaintiff,

v.

VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM,
Defendants.

**DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION TO TEMPORARY
RESTRAINING ORDER / PRELIMINARY INJUNCTION**

NOW COME the Defendants, Virtual Fulfillment Center, LLC, Mohamed Kassem, Omar Neamatalla, Mohamed Ali, and Ahmed Kasem (collectively referred to as "Defendants" or "VFC Parties") and hereby oppose the Plaintiff, Dany Abouelkhier's ("Plaintiff" or "Mr. Abouelkhier") Motion for Temporary Restraining Order / Preliminary Injunction.

The Defendants submit the accompanying Affidavits of Mohamed Kassem, Omar Neamatalla, Mohammed Ali, and Ahmed Kasem, and a Memorandum of Law.

WHEREFORE, the Defendants pray this Court DENY the Plaintiff's Motion for Temporary Restraining Order / Preliminary Injunction.

VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM,
Defendants.

**DEFENDANT VIRTUAL FULFILLMENT CENTER, LLC'S CROSS-MOTION FOR
PRELIMINARY INJUNCTION**

NOW COME the Defendant Virtual Fulfillment Center, LLC, ("LLC") and moves this Court to issue a Preliminary Injunction against the Plaintiff, Dany Abouelkhier ("Plaintiff" or "Mr. Abouelkhier") until a final hearing on the merits of this matter.

The Defendants submit the accompanying Affidavits of Mohamed Kassem, Omar Neamatalla, Mohamed Ali, and Ahmed Kasem, and a Memorandum of Law.

WHEREFORE, the Defendants pray this Court:

- A) Enjoin Dany Abouelkhier from stating to any public or private entity that he represents, speaks on behalf of, or otherwise has any authority to act on behalf of Virtual Fulfillment Center, LLC until a final hearing on the merits of this matter;
- B) Enjoin Dany Abouelkhier from possessing any property of the Virtual Fulfillment Center, LLC, including but not limited to the 2023 Jeep Grand Cherokee 4XE VIN: 1C4RJYB61P8786536, and to return such property forthwith to a listed Manager of the LLC.

Respectfully Submitted,
Defendants,
VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM
By counsel,

/s/ Alexander W. Levine
Alexander W. Levine, BBO# 688231
RIVER STREET LAW
11 River Street, Suite 301
Wellesley, MA 02481
(781) 369-7090
alevine@riverstreetlaw.com

CONCLUSION

WHEREFORE, the Defendants pray this Court DENY the Plaintiff's Motion for
Temporary Restraining Order / Preliminary Injunction and to:

- A) Enjoin Dany Abouelkhier from stating to any public or private entity that he represents,
speaks on behalf of, or otherwise has any authority to act on behalf of Virtual Fulfillment
Center, LLC, until a final hearing on the merits of this matter;

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Date Filed 11/14/2024 12:19 PM
Superior Court - Suffolk
Docket Number 2404CV02931

- B) Enjoin Dany Abouelkhier from possessing any property of the Virtual Fulfillment Center,
LLC, including but not limited to the 2023 Jeep Grand Cherokee 4XE VIN:
1C4RJYB61P8786536, and to return such property forthwith to a listed Manager of the
LLC.

Respectfully Submitted,
Defendants,
VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM
By counsel,

/s/ Alexander W. Levine
Alexander W. Levine, BBO# 688231
RIVER STREET LAW
11 River Street, Suite 301
Wellesley, MA 02481
(781) 369-7090
alevine@riverstreetlaw.com

Dated: November 14, 2024.

CERTIFICATE OF SERVICE

I, Alexander W. Levine, hereby certify that on November 14, 2024, I caused the
foregoing to be served upon the Plaintiff via e-mail.

/s/ Alexander W. Levine

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931-H

DANY ABOUELKHIER,

Plaintiff / Defendant-in-Counterclaim,
v.

VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMED ALI, and
AHMED KASEM,
Defendants / Plaintiffs-in-Counterclaim.

MOTION FOR EXTENSION OF TIME

NOW COMES the Plaintiff / Defendant-in-Counterclaim, Dany Abouelkhier ("Plaintiff"), and respectfully moves this Honorable Court for an extension of time to take appropriate action regarding the Counterclaims filed by the Defendants / Plaintiffs-in-Counterclaim. In support of this Motion, Plaintiff states as follows:

1. Plaintiff is currently in the process of securing legal representation to assist with addressing the Counterclaims and other complex legal matters in this case.
2. Given the complexity of the claims and legal issues involved, additional time is necessary to ensure that Plaintiff can properly evaluate and take appropriate action regarding the Counterclaims.
3. Plaintiff respectfully requests an extension of 30 days, up to and including March 30, 2025, to take such action.
4. Granting this Motion will not prejudice the Defendants / Plaintiffs-in-Counterclaim and will serve the interests of justice by allowing Plaintiff adequate time to proceed accordingly.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant an extension of 30 days, or any other period the Court deems reasonable, to address the Counterclaims.

Respectfully submitted,

DANY ABOUELKHIER
Plaintiff / Defendant-in-Counterclaim
550 Liberty St. Unit 905
Braintree, MA 02184
Tel: (617) 909-7799
Email: danytaw@yahoo.com

SUFFOLK, SS

SUPERIOR COURT DEPARTMENT
DOCKET NO.: 2484CV02931-H

DANY ABOUELKHIER,
Plaintiff / Defendant-in-Counterclaim,
v.
VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM,
Defendants / Plaintiffs-in-Counterclaim.

**NO OPPOSITION TO PLAINTIFF'S MOTION FOR EXTENSION OF TIME
TO RESPOND TO COUNTERCLAIMS**

NOW COME the Defendants / Plaintiffs-in-Counterclaim Virtual Fulfillment Center, LLC ("VFC"), Mohamed Kassem ("Mr. Kassem"), Omar Neamatalla ("Mr. Neamatalla"), Mohamed Ali ("Mr. Ali"), and Ahmed Kasem ("Mr. Kasem") (collectively referred to as the "Defendants" or "VFC Parties"), and hereby state there is no opposition to Dany Abouelkhier's request to have until March 30, 2025 to respond to the VFC Parties' filed Counterclaims.

Defendants / Plaintiffs-in-Counterclaim,
VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMMED ALI, and
AHMED KASEM
By counsel,

/s/ Alexander W. Levine

Alexander W. Levine, BBO# 688231
RIVER STREET LAW
11 River Street, Suite 301
Wellesley, MA 02481
(781) 369-7090
alevine@riverstreetlaw.com

Dated: March 18, 2025

Date Filed 3/18/2025 8:14 PM
Superior Court - Suffolk
Docket Number 2484CV02931

CERTIFICATE OF SERVICE

I, Alexander W. Levine, hereby certify that on March 18, 2025, I caused the foregoing to be served upon the Plaintiff via e-mail.

/s/ Alexander W. Levine
Alexander W. Levine