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COMMONWEALTH OF MASSACHUSETTS

NOTIFY

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.)

JOINT MOTION TO EXTEND TRACKING ORDER
BY 120 DAYS

NOW COME all parties to this matter and hereby jointly move this Court to extend the Tracking Order by 120 days, and mandate the "Request Dates" in the below for an amended Tracking Order. On September 30, 2025, the Court imposed the below "Current Dates" for Discovery, Rule 56 Motions served, Rule 56 Motions Filed, and a Rule 56 Hearing date. Some "Requested Dates" below are expanded to allow for Superior Court Rule 9A service, opposition, and cross-motion timelines. In support thereof, the parties state that Discovery is still ongoing, and was temporarily stayed by Plaintiff's Motion to Dismiss pursuant to G.L. c. 231, § 59H. The parties are continuing to discuss settlement. This is a joint motion and no parties will be prejudiced by the allowance of this motion

	Current Dates	Requested Dates
Discovery	04/01/2026	08/01/2026
Rule 56 Served By	04/16/2026	09/01/2026
Rule 56 Filed By	5/16/2026	11/01/2026
Rule 56 Hearing	05/28/2026	December 2026 or as scheduled by the court

4/3/2026. Allowed. No further conferences.

Final Pre-Trial Conference	03/02/2026	03/02/2027
Judgment	11/09/2026	11/09/2027

WHEREFORE, the parties request the Court allow this motion and mandate the Requested Dates for an amended Tracking Order.

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

By counsel,

/s/ Alexander W. Levine

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Dated: March 31, 2026

Plaintiff/ defendant in counterclaim
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