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COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931-H

DANY ABOUELHKIER,

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

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Email: danytaw@yahoo.com

Date: February 28, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2025 a copy of the foregoing was served via electronic mail on all counsel of record.

Alexander W. Levine

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By Dany Abouelkhier

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