

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931

DANY ABOUELHKIER, Pro Se
Plaintiff,

v.

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

MOTION FOR LEAVE TO FILE LATE ANSWER TO COUNTERCLAIMS

Defendant-in-Counterclaim Dany Abouelkhier respectfully moves this Court pursuant to Mass. R. Civ. P. 6(b) for leave to file his Answer to Counterclaims one day late.

In support, Defendant states:

1. The original deadline to file an Answer to the Counterclaims was February 12, 2026.
2. Prior to that deadline, Defendant requested and received assent from Plaintiffs-in-Counterclaim's counsel, pursuant to Superior Court Rule 9A, to extend the deadline to February 23, 2026.
3. On February 23, 2026, the Commonwealth declared a state of emergency due to a severe winter storm, and the Massachusetts Trial Courts were officially closed.

4. Defendant experienced storm-related internet instability and was unable to complete and electronically file the Answer on that date.
5. Defendant is filing the Answer immediately upon restoration of service and court operations.
6. The delay is minimal, was caused by extraordinary weather conditions beyond Defendant's control, and results in no prejudice to Plaintiffs-in-Counterclaim.

WHEREFORE, Defendant respectfully requests that the Court allow the attached Answer to Counterclaims to be filed.

Respectfully submitted,

Dany Abouelkhier (Pro Se)

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Braintree, MA 02184

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Date: February 24, 2026

/s/ Dany Abouelkhier

Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on February 24, 2026 a copy of the foregoing was served via electronic mail on all counsel of record.

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Respectfully submitted,

Dany Abouelkhier, appearing pro se

/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)