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COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931
H

DANY ABOUELHKIER, Pro Se
Plaintiff,

v.

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

PLAINTIFF'S MOTION TO DISQUALIFY ATTORNEY ALEXANDER W. LEVINE

Plaintiff Dany Abouelkhier ("Plaintiff"), appearing pro se, respectfully moves this Honorable Court to disqualify Attorney Alexander W. Levine from representing Virtual Fulfillment Center, LLC ("VFC") and the individual defendants in this action.

As set forth in the accompanying Memorandum of Law, Attorney Levine's continued representation violates Massachusetts Rules of Professional Conduct 1.7(a), 1.13(g), and 1.16(a) (1) because:

1. His representation is directly adverse to the LLC's only recorded manager and its founder;
2. He was retained without lawful authority, without any vote, meeting, or consent of the LLC;

3. His engagement was part of a covert plan to “remove Dany from the manager role”
(See Exhibit), creating a non-waivable structural conflict;
4. He simultaneously represents the LLC and a faction of individuals whose interests are
diametrically opposed to the LLC’s lawful governance; and
5. He is a necessary fact witness to the disputed events, including the secret retention
plan, alleged “structural changes,” and the filing of counterclaims.

Because Attorney Levine’s engagement violates the Rules of Professional Conduct and
undermines the integrity of these proceedings, disqualification is mandatory.

Plaintiff respectfully requests that the Court:

1. Disqualify Attorney Alexander W. Levine from any representation of VFC or the
individual defendants; and
2. Order Attorney Levine to submit, for in camera review or filing with the Court, all
documents showing his alleged authority to act for VFC, including any engagement letters,
votes, resolutions, minutes, written consents, communications, or other materials purporting to
authorize his retention and the filing of Counterclaims.

Respectfully submitted,

Dany Abouelkhier (Pro Se)

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Date: December 5, 2025

/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2025 a copy of the foregoing was served via electronic mail on all counsel of record.

Alexander W. Levine
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Respectfully submitted,

Dany Abouelkhier, appearing pro se

/s/ **Dany Abouelkhier**

Dany Abouelkhier (Pro Se)