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COMMONWEALTH OF MASSACHUSETTS

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.

**DEFENDANTS' / PLAINTIFFS-IN-COUNTERCLAIMS' OPPOSITION TO
PLAINTIFF'S / DEFENDANT-IN-COUNTERCLAIM'S MOTION TO STRIKE
COUNTERCLAIMS; AND CROSS-MOTION FOR COUNTERCLAIMS TO REMAIN
AND BE RESPONDED TO WITHIN 10 DAYS**

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 "VFC Parties"), and hereby oppose the Plaintiff / Defendant-in-Counterclaim Dany Abouelkhier's ("Mr. Abouelkhier") Motion to Strike Counterclaims.¹ The VFC Parties also cross-move and request this Court to allow the Counterclaims to remain, and for Mr. Abouelkhier to responsively plead to said Counterclaims within ten (10) days of the allowance of this cross-motion.

The VFC Parties argue and state as follows:

1. This case concerns multiple disputes regarding a domestic limited liability company, VFC (a food business exclusively for take-out / delivery service).

¹ The motion was served via e-mail on March 31, 2025, not March 30 as indicating in the certificate of service.

Denied w/o prejudice.

*MDR-ES
7/30/25*