

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931-H

DANY ABOUELHKIER,

Plaintiff,

v.

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

Defendants.

NOTICE OF FILING FIRST AMENDED COMPLAINT

Now comes the Plaintiff, Dany Abouelkhier, appearing pro se, and hereby gives notice that, pursuant to the Court's order of July 30, 2025 (Ricciuti, J.), granting Plaintiff leave to amend, he files the attached First Amended Complaint against Defendants.

The Amended Complaint supersedes the prior pleading and reframes this matter as a civil action for declaratory relief, breach of fiduciary duty, fraud, civil conspiracy, quantum meruit, unjust enrichment, constructive trust, violation of G.L. c. 93A, and related equitable relief.

A Civil Action Cover Sheet is also submitted herewith pursuant to G.L. c. 212, §3A.

Respectfully submitted,

Dany Abouelkhier (Pro Se)

550 Liberty St. Unit 905

Braintree, MA 02184

Tel: (617) 909-7799

Email: danytao@yahoo.com

Date: August 28th, 2025

/s/ **Dany Abouelkhier**

Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

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

Alexander W. Levine
RIVER STREET LAW
11 River Street, Suite 301
Wellesley, MA 02481
Tel: (781) 369-7090
Fax: (781) 369-7090
alevine@riverstreetlaw.com
www.riverstreetlaw.com

Respectfully submitted,

Dany Abouelkhier, appearing pro se

/s/ Dany Abouelkhier

Dany Abouelkhier (Pro Se)