

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931

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DANY ABOUELHKIER, Pro Se
Plaintiff,

v.

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

**PLAINTIFF'S ASSENTED-TO MOTION TO ENLARGE TIME TO FILE ANSWER TO
DEFENDANTS' COUNTERCLAIMS**

Plaintiff, Dany Abouelkhier, respectfully moves this Court, pursuant to Mass. R. Civ. P. 6(b), to enlarge the time within which he may file his Answer to Defendants' Counterclaims, up to and including February 23, 2026.

In support of this motion, Plaintiff states as follows:

1. Defendants filed Counterclaims against Plaintiff in this action.
2. Plaintiff previously moved to dismiss the Counterclaims, and the Court denied that motion.
3. Under Mass. R. Civ. P. 12(a)(1), Plaintiff is required to serve and file his Answer to the Counterclaims within the prescribed period following denial of the motion to dismiss.

4. Plaintiff requires a brief additional period to prepare and file a complete and proper Answer, in order to ensure that the pleadings accurately and fully address the Counterclaims.

5. Plaintiff has conferred with counsel for Defendants regarding this request, and Defendants assent to the requested enlargement of time.

6. Mass. R. Civ. P. 6(b) provides that the Court may, for cause shown, enlarge the time within which an act must be done. The requested extension is brief, is made in good faith, and will not prejudice any party.

7. Granting this motion will promote the orderly and efficient resolution of this matter on its merits.

WHEREFORE, Plaintiff respectfully requests that this Court enlarge the deadline for Plaintiff to file his Answer to Defendants' Counterclaims up to and including February 23, 2026, and grant such further relief as this Court deems just and proper.

Respectfully submitted,

Dany Abouelkhier (Pro Se)

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Date: February 12, 2026

/s/ Dany Abouelkhier

Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on February 12, 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)