

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.

AFFIDAVIT OF DANY ABOUELKHIER

I, Dany Abouelkhier, being duly sworn, depose and say as follows:

1. I am the Plaintiff in the above-captioned action. I submit this affidavit based on my personal knowledge and on documents received and maintained in the ordinary course of business.
2. This affidavit is submitted solely to identify, authenticate, and explain the source and context of the exhibits filed in this matter. It is not submitted for the purpose of legal argument.
3. Exhibit 1 is a true and accurate copy of the Certificate of Organization for Virtual Fulfillment Center, LLC obtained from the Massachusetts Secretary of the Commonwealth. I relied upon this document during company operations and maintained it as part of the company's records.

4. Exhibits 2 and 3 are true and accurate copies of internal communications among the business partners and related documents exchanged by parties involved with Virtual Fulfillment Center, LLC during the course of business operations. These communications were sent to or received by me contemporaneously and were maintained by me in the ordinary course of business.

5. Exhibit 4 is a true and accurate copy of an email from Kristen Scanlon, who served as business licensing counsel for Virtual Fulfillment Center, LLC in connection with the company's takeout license. At the time of this communication, Ms. Scanlon represented the company and treated the company as her client.

6. After issues arose regarding the company's governance, I requested from Ms. Scanlon copies of company-related correspondence and communications maintained in her file. In response to that request, Ms. Scanlon properly provided copies of relevant company communications, including the email attached as Exhibit 4.

7. Through the communications provided by Ms. Scanlon, including Exhibit 4, I first became aware of discussions concerning proposed changes to the company's structure and management through Kristen Scanlon. I had not been copied contemporaneously on certain communications between Kristen Scanlon, Ahmed Kasem and Alexander Levine.

8. Exhibit 5 is a true and accurate copy of an email authored by Defendant Ahmed Kasem introducing Attorney Alexander W. Levine and describing his anticipated involvement with respect to changes to the company's structure, including matters relating to my removal from my company.

9. Exhibit 6 is a true and accurate copy of a subsequent communication characterizing my role with the company as that of an independent contractor. This communication was received after the events reflected in Exhibits 1 through 5.

10. All exhibits referenced in this affidavit are true and accurate copies of the documents as they exist and as they were received by me. I have not altered, edited, or modified any of the exhibits.

I declare under the pains and penalties of perjury that the foregoing is true and correct.

Respectfully submitted,

Dany Abouelkhier (Pro Se)

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Braintree, MA 02184

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Email: danytao@yahoo.com

Date: December 23, 2025

/s/ Dany Abouelkhier

Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 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)