

EXHIBIT INDEX

Exhibit 1 – Defendants’ Opposition & Cross-Motion re: Counterclaims (Apr. 17, 2025)

Exhibit 2 – Common Victualler License Application (Boston Licensing Board)

– Listing Plaintiff as Manager of Record and 20% Owner

Exhibit 3 – Amendment to Certificate of Organization (Oct. 31, 2024)

– Purporting to remove Plaintiff as Manager (signed under penalties of perjury)

Exhibit 4 – Original Certificate of Organization (Jan. 12, 2023)

– Naming Plaintiff as Manager of VFC at formation

Respectfully submitted,

Dany Abouelkhier, Pro Se Plaintiff

Date Filed 4/17/2025 3:07 PM
Superior Court - Suffolk
Docket Number 2484CV02931

OH 23

NOTIFY

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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.

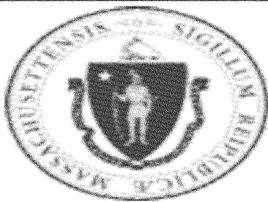
The VFC Parties argue and state as follows:

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.

*EWK-LS
7/30/25*



**The Commonwealth of Massachusetts
William Francis Galvin**

Minimum Fee: \$500.00

Secretary of the Commonwealth, Corporations Division
One Ashburton Place, 17th floor
Boston, MA 02108-1512
Telephone: (617) 727-9640

Certificate of Organization

(General Laws, Chapter)

Identification Number: 001629961

1. The exact name of the limited liability company is: VIRTUAL FULFILLMENT CENTER LLC

2a. Location of its principal office:

No. and Street: 319 WASHINGTON ST
SUITE 2
City or Town: BRIGHTON State: MA Zip: 02135 Country: USA

2b. Street address of the office in the Commonwealth at which the records will be maintained:

No. and Street: 319 WASHINGTON ST
SUITE 2
City or Town: BRIGHTON State: MA Zip: 02135 Country: USA

3. The general character of business, and if the limited liability company is organized to render professional service, the service to be rendered:

FOOD ESTABLISHMENT WITH MULTIPLE PRODUCT LINES FOR PICKUP ONLY.

4. The latest date of dissolution, if specified:

5. Name and address of the Resident Agent:

Name: MOHAMED KASSEM
No. and Street: 49 CONCORD AVE
City or Town: BELMONT State: MA Zip: 02478 Country: USA

I, MOHAMED KASSEM resident agent of the above limited liability company, consent to my appointment as the resident agent of the above limited liability company pursuant to G. L. Chapter 156C Section 12.

6. The name and business address of each manager, if any:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code
MANAGER	DANY ABOELKHEIR	3 WASHINGTON STREET SOMERVILLE, MA 02143 USA

7. The name and business address of the person(s) in addition to the manager(s), authorized to execute documents to be filed with the Corporations Division, and at least one person shall be named if there are no managers.

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code

8. The name and business address of the person(s) authorized to execute, acknowledge, deliver and record any recordable instrument purporting to affect an interest in real property:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code