

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2484CV02931-H

DANY ABOUELHKIER,

Plaintiff / Defendant-in-Counterclaim,
v.

VIRTUAL FULFILLMENT CENTER, LLC,
MOHAMED KASSEM,
OMAR NEAMATALLA,
MOHAMED ALI, and
AHMED KASEM,
Defendants / Plaintiffs-in-Counterclaim.

NOTICE OF RULE 9A COMPLIANCE AND REQUEST FOR RULING

NOW COMES the Plaintiff / Defendant-in-Counterclaim, Dany Abouelkhier ("Plaintiff"), and respectfully submits this Notice of Rule 9A Compliance and Request for Ruling in relation to the Motion for Extension of Time, originally filed on February 28, 2025.

Background

- Plaintiff filed a Motion for Extension of Time on February 28, 2025, requesting an additional 30 days to take appropriate action regarding the Counterclaims.
- The motion was properly served on opposing counsel, Attorney Alexander W. Levine, via first-class mail and electronic mail on February 28, 2025, in compliance with Rule 9A.
- Opposing counsel did not file an opposition or response within the timeframe required under Massachusetts Superior Court Rule 9A.

- Plaintiff inadvertently omitted the Rule 9A package from the original filing but now submits it to ensure full compliance.

Rule 9A Compliance

- Pursuant to Rule 9A(b)(2), Plaintiff hereby provides the required Certificate of Compliance, attached hereto as Exhibit A.
- Plaintiff certifies that the motion was properly served, and no opposition has been filed, making the motion ripe for ruling.

Request for Ruling

- Given that the motion is unopposed, Plaintiff respectfully requests that this Honorable Court accept this Notice of Rule 9A Compliance and rule on the pending Motion for Extension of Time at its earliest convenience.

WHEREFORE, Plaintiff respectfully requests that the Court:

- (1) Accept this filing as compliance with Rule 9A;
- (2) Rule on the pending Motion for Extension of Time; and
- (3) Grant any further relief the Court deems just and proper.

Respectfully submitted,

DANY ABOUELHKIER

Plaintiff / Defendant-in-Counterclaim

550 Liberty St. Unit 905

Braintree, MA 02184

Tel: (617) 909-7799

Email: danytaw@yahoo.com

March 17, 2025

/s/ Dany Abouelkhier

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Rule 9A Compliance and Request for Ruling, along with the attached Rule 9A package (Exhibit A), was served upon all counsel of record via first-class mail and electronic mail on March 17, 2025, as follows:

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

Dated: March 17, 2025

DANY ABOUELHKIER
Plaintiff / Defendant-in-Counterclaim
550 Liberty St. Unit 905
Braintree, MA 02184
Tel: (617) 909-7799
Email: danytaw@yahoo.com

/s/ Dany Abouelkhier

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Exhibit A - Rule 9A Certificate of Compliance

I, Dany Abouelkhier, certify that:

1. The Motion for Extension of Time was properly served on opposing counsel via first-class mail and email on February 28, 2025.
2. Opposing counsel did not oppose or respond to the motion within the timeframe required by Massachusetts Superior Court Rule 9A.
3. Pursuant to Rule 9A(b)(2), the motion is now ripe for ruling as no opposition has been filed.

Signed under the pains and penalties of perjury,

Dated: March 17, 2025

DANY ABOUELHKIER

Plaintiff / Defendant-in-Counterclaim

550 Liberty St. Unit 905

Braintree, MA 02184

Tel: (617) 909-7799

Email: danytaw@yahoo.com

/s/ Dany Abouelkhier