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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.

MOTION TO STRIKE DEFENDANTS' COUNTERCLAIMS AND INCORPORATED
MEMORANDUM OF LAW

NOW COMES the Plaintiff and Defendant-in-Counterclaim, Dany Abouelkhier ("Plaintiff" or "Defendant-in-Counterclaim") pro se, and respectfully moves this Honorable Court to strike the counterclaims filed by Defendants / Plaintiffs-in-Counterclaim, Virtual Fulfillment Center, LLC, Mohamed Kassem, Omar Neamatalla, Mohamed Ali, and Ahmed Kasem ("Defendants" or "Plaintiffs-in-Counterclaim"), on the grounds that the counterclaims were filed improperly, in violation of **Massachusetts Rules of Civil Procedure 13 and 15**, and without leave of court.

Allowed without prejudice

*LCR-CT
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