

Housing Court Department

Division: Metro South

Address: 215 Main Street, Suite 160, Brockton MA 02301

Telephone Number: (508) 894-4170

Hours of Operations: Monday - Friday 8:30 AM to 4:30 PM

For Court Use Only:

Docket No:

eSummons Document ID:

MD24 - 5E4A6D3D22

Commonwealth of Massachusetts

ELECTRONIC SUMMARY PROCESS (EVICTION) SUMMONS AND COMPLAINT

IMPORTANT: NOTICE OF A COURT CASE TO EVICT YOU - PLEASE READ IT CAREFULLY

***IMPORTANTE: ESTA ES UNA NOTIFICACION DE UN CASO EN CORTE RESPETO A
PROCEDIMIENTOS DE DESALOJO - POR FAVOR DE LEER CON CUIDADO***

Ahmed Naguib, Dany Abouelkhier, & Sandra Fernandez De Villanicensio Frommer

TO: DEFENDANT(S)/TENANT(S)/OCCUPANT(S):

ADDRESS: 550 Victory Road, Apt. S339

CITY/TOWN: Quincy

ZIP: 02171

EMAIL:

TELEPHONE:

YOU WILL BE SERVED WITH A NOTICE OF THE DATE, TIME AND MANNER OF YOUR HEARING WHEN IT IS SCHEDULED BY THE COURT.

You are hereby summonsed to appear at a hearing before a Judge of the Court to defend against the complaint of:

PLAINTIFF/LANDLORD/LESSOR/OWNER:

Marina Bay Residences, LLC

of STREET: 552 Victory Road

CITY/TOWN: Quincy

ZIP: 02171

that you occupy the premises at 550 Victory Road, Apt. S339

Quincy, MA

being within the judicial district of this Court, unlawfully and against the right of said Plaintiff/Landlord/Owner

because: Failure to Vacate at expiration of lease and following a Notice of Non-Renewal for fault dated 4/24/24, a copy of which is attached hereto.

and further, that \$N/A rent is owed according to the following account:

ACCOUNT ANNEXED (itemize)

N/A

Ted Papadopoulos, AMPS Law PC

Printed Name of Plaintiff or Attorney

Signature of Plaintiff or Attorney

304 Cambridge Road, STE 440 Woburn, MA 01801

Address of Plaintiff or Attorney

Ted@ampslaw.com

Email of Plaintiff or Attorney

781-756-6600

Telephone Number

671506

BBO#

NOTICE TO EACH DEFENDANT/TENANT/OCCUPANT

If you do not file and serve an answer, or if you do not defend at the time of the trial, Judgment may be entered against you for possession and the rent as requested in the complaint. Please see the Notice to Defendant section on the back side of this page.

FOR INFORMATION ABOUT EMERGENCY RENTAL AND MORTGAGE ASSISTANCE:

Please visit: www.mass.gov/applying-for-rental-assistance-in-massachusetts-to-avoid-eviction or call 211 for assistance.

To the Sheriff of our several counties, or their Deputies, or any constable of any City or Town within said Commonwealth, Greetings: We command you to summon the within named defendant(s)/tenant(s)/occupant(s) to appear as herein ordered.

WITNESS:

/s/ Neil K. Sherring

First Justice

/s/ Nella M. Lussier

Clerk Magistrate

Service by: 6/10/24

Entry Date by: 6/17/24

Trial Date: To Be Determined by the Court

!Importante! ;Traducir! Enpòtan! Tradwi! Quan Trọng! Dich!

IMPORTANT NOTICE TO ALL PARTIES

If you need a free interpreter or reasonable accommodations, please call the Court's Clerk's Office. For information about the Lawyer for the Day Program, Tenancy Preservation Program, or other services that may help both parties with their case, please go to:
<https://www.mass.gov/guides/housing-court-resources>

IMPORTANT NOTICE TO PLAINTIFF/LANDLORD/LESSOR/OWNER: Have the Officer complete and return the below return notice. Service must be made on each defendant(s) not later than the seventh day and not earlier than the thirtieth day before the Monday entry date. This form must be filed in Court no later than the close of business on the scheduled Monday entry date. In appropriate cases, proper evidence of notice to quit must be provided to this Court upon the filing of this Complaint.
A P.O. box will not be accepted as an address for the Plaintiff

Officer's Return

Norfolk _____, ss

Date: June 8, 2024

City/Town: Quincy

By virtue of this Writ, I this day served the within-named each defendant/tenant/occupant, and summonsed him/her as herein directed, by giving in hand to _____

or leaving it at the last and usual place of abode at 550 Victory Road, Apt. S339, Quincy, MA 02171

A copy of this summons was mailed first class to each defendant/tenant/occupant at the address on: June 8, 2024

Served and Mailed to: Ahmed Naguib

Fees for Service

Service	\$ 65.00
Copy/Attest	\$ _____
Travel	\$ _____
Use of Car	\$ _____
Mailing	\$ _____
TOTAL	\$ 65.00

Stephen Minkofsky
Signature of Officer

Stephen Minkofsky, Constable
Printed Name of Officer

7 Cabot Place, Stoughton, MA
Address of Officer

781 344 0411
Telephone Number of Officer

IMPORTANT NOTICE TO EACH DEFENDANT/TENANT/OCCUPANT: When this case is filed with the Court, you will be served with a notice of the date, time and manner of your hearing when it is scheduled by the court. If you do not receive a notice, please contact the Court's Clerk's Office at (508) 894-4170

You (or your attorney) must participate in all Court events to present your defense. You (or your attorney) must also file a written Answer to this Complaint. An Answer is your response stating the reason(s) why you should not be evicted and may include any claims you have against the Plaintiff. A Summary Process Answer Form is available on the Housing Court's website at www.mass.gov/lists/housing-court-forms and in the Clerk's Office.

You must file (e-file, deliver or mail) your Answer with the Court's Clerk's Office and serve (deliver or mail) a copy on the Plaintiff (or Plaintiff's attorney) at the address shown in this summons. The Court's notice about the court event will also include the deadline by which the Answer must be received by the Court's Clerk's Office and received by the Plaintiff (or the Plaintiff's Attorney).

¡Importante! ¡Traducir! Enpòtan! Tradwi! Quan Trọng! Dịch!

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Norfolk _____, ss

Date: June 8, 2024

City/Town: Quincy

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Served and Mailed to: Dany Abouelkhir

Fees for Service

Service	\$ 65.00
Copy/Attest	\$ _____
Travel	\$ _____
Use of Car	\$ _____
Mailing	\$ _____
TOTAL	\$ 65.00

Stephen Minkofsky
Signature of Officer

Stephen Minkofsky, Constable
Printed Name of Officer

7 Cabot Place, Stoughton, MA
Address of Officer

781 344 0411
Telephone Number of Officer

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Norfolk _____, ss

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A copy of this summons was mailed first class to each defendant/tenant/occupant at the address on: June 8, 2024

Served and Mailed to: Sandra Fernandez De Villanicensio

Frommer
Fees for Service

Service	\$ 65.00
Copy/Attest	\$ _____
Travel	\$ _____
Use of Car	\$ _____
Mailing	\$ _____
TOTAL	\$ 65.00

Stephen Minkofsky
Signature of Officer

Stephen Minkofsky, Constable
Printed Name of Officer

7 Cabot Place, Stoughton, MA
Address of Officer

781 344 0411
Telephone Number of Officer

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04/24/2024

**Via First Class Mail &
Hand Delivery**

Ahmed Naguib
Dany Abouelkhier
Sandra Fernandez De Villanicensio Frommer
550 Victory Road Apt #S339
Quincy, MA 02171

RE: Notice of Non-Renewal

Dear Dany Abouelkhier, Sandra Fernandez De Villanicensio Frommer & Ahmed Naguib:

This notice is intended to timely advise you that your landlord, Marina Bay Residences LLC, does not intend to renew your tenancy and you are therefore required to **QUIT and DELIVER UP** the premises now held by you located at 550 Victory Rd, Apt S339 Quincy, MA 02171, at the conclusion of your lease term, being **05/31/2024**.

There have been no prior offers to renew your tenancy.

The reason(s) for non-renewal of your lease/tenancy include, but are not necessarily limited to:

- chronic late and/or general non-payment of rent;
- failure to come to a reasonable escrow agreement for purported *withheld* rent, despite your continued and uninterrupted occupancy/use of the apartment home;
- failures to reasonably cooperate with efforts to address issues you have raised regarding your occupancy/use of the apartment home; and
- failures to provide reasonable access to the apartment home for maintenance and/or repair purposes.

**HEREOF FAIL NOT OR WE SHALL EMPLOY DUE COURSE OF LAW TO
EJECT YOU FROM SAME.**

In reliance on this Notice of Non-Renewal, your landlord will be seeking to lease the apartment home you currently occupy to other tenants starting as soon as practicable after your lease term ends on 5/31/2024.

Accordingly, please contact the management office on or before **05/1/2024** to confirm that you will be vacating and surrendering the premises upon the conclusion of your lease term on 05/31/2024.

Ahmed Naguib
Dany Abouelkhier
Sandra Fernandez De Villanicensio Frommer
04/24/2024
Page 2

Should you fail to contact the management office by the above date (i.e., by 05/01/2024) and provide written notice to confirm that you will be vacating, we will assume that you are refusing to vacate and may proceed accordingly with an action pursuant to M.G.L. c. 239 s.1A.

Please note that this Notice of Non-Renewal shall not waive any prior action against you, nor any previously served non-renewal notice and/or notice to quit. Please also note that any payments received for any period after the expiration of your tenancy shall be accepted for use and occupancy only and shall not create any new tenancy (or otherwise extend your current lease/tenancy).

Please contact the management office with any questions regarding this notice.

Very truly yours,

Leah Cataldo

Digitally signed by Leah
Cataldo
Date: 2024.04.24
13:38:52 -04'00'

Leah Cataldo
Regional Portfolio Manager

cc: AMPS Law PC



ALL STATE CONSTABLES, INC.

7 Cabot Place, Suite 3

Stoughton, MA 02072

(781) 344-0411 (Telephone)

Adam@allstateconstables.com (Email)

www.allstateconstables.com (Web)

Marina Bay Residences, LLC v. Ahmed Naguib, Dany Abouelhkier, and Sandra Fernandez De Villanicensio Frommer

RETURN OF SERVICE

I did this date, April 25, 2024; serve a true attested copy of the following:

- Notice of Non-Renewal

by leaving at the last and usual place of residence; said service was made to each party, Ahmed Naguib, Dany Abouelhkier, and Sandra Fernandez De Villanicensio Frommer at:

550 Victory Road, Apt. S339
Quincy, MA 02171

and on the same date, I did mail via first class mail a second true attested copy to:

Ahmed Naguib, Dany Abouelhkier, and Sandra Fernandez De Villanicensio
Frommer
550 Victory Road, Apt. S339
Quincy, MA 02171

Signed under the pains and penalties of perjury this 25th day of April, 2024.



Stephen Minkofsky,
Constable/Disinterested Person