

COMMONWEALTH OF MASSACHUSETTS
HOUSING COURT DEPARTMENT
METRO SOUTH DIVISION

NORFOLK, SS.

DOCKET No. 24H82SP03575

LENOX FARMS LIMITED PARTNERSHIP,

Plaintiff,

v.

MOHAMED KASSEM, DANNY ABOUELKHIER,

Defendants.

**DEFENDANT DANNY ABOUELKHIER'S EMERGENCY MOTION TO STAY ENTRY
OF JUDGMENT AND ANY DISPOSITIVE ACTION, TO PRECLUDE DISPOSITIVE
RELIANCE ON PRIOR HEARING STATEMENTS AND CROSS-DOCKET
CHARACTERIZATIONS, AND TO MAINTAIN STATUS QUO**

(With Incorporated Memorandum of Law)

I. INTRODUCTION

Defendant Danny Abouelkhier ("Defendant"), appearing pro se, respectfully moves for an order:

- staying entry of judgment, execution for possession, dismissal, or other dispositive action;
- precluding dispositive reliance on prior hearing statements and cross-docket characterizations; and
- maintaining the status quo pending trial and appellate review.

This motion does not seek reconsideration of prior rulings.

It seeks to prevent irreversible action based on a record that remains disputed and not adjudicated at trial.

4-17-2026: After hearing on 4-6-2026 and pursuant to this Court's
4-15-2026 ORDER and 4-17-2026 ORDER, DENIED.