

**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.

AFFIDAVIT OF DANNY ABOUELKHIER

I, Danny Abouelkhier, under the pains and penalties of perjury, state as follows:

1. I am a Defendant in this action and submit this affidavit in support of my Opposition to Plaintiff's Motion in Limine, Motion to Amend, and Motion to Dismiss or Strike claims as to me.
2. I have never signed any lease with Plaintiff and have never entered into any written or oral agreement with Plaintiff to rent the premises.
3. I was never screened or added to the lease as a tenant by Plaintiff.
4. I did not have any direct contractual relationship or privity with Plaintiff at any time.

5. Plaintiff's communications regarding the lease, tenancy obligations, and property management were directed to other individuals, including Mohamed Kassem and Sandra Frommer, and not to me as a tenant or contracting party.

6. Any payment I made in connection with the premises was made voluntarily and on behalf of another individual, and not pursuant to any obligation owed by me to Plaintiff.

7. I have never agreed to pay rent or use and occupancy to Plaintiff, and Plaintiff has never obtained my agreement to assume such obligation.

8. To my knowledge, any account or ledger maintained by Plaintiff is not in my name and reflects charges associated with another individual's tenancy.

9. I have not been served with a valid Notice to Quit terminating any tenancy as to me.

10. In a separate injunction proceeding involving the same premises, Plaintiff has expressly taken the position that I am not a tenant but rather a "guest," and has sought to deny me legal rights on that basis.

11. Plaintiff is now taking an inconsistent position in this action by attempting to impose monetary liability and obtain execution against me despite previously asserting that I am not a tenant.

12. I have asserted my right to a jury trial in this matter and do not consent to a bench trial.

13. The Court's February 17, 2026 order, which struck my jury demand and imposed sanctions related to use and occupancy, is currently on appeal.

14. I have not assumed, and do not have, any legal obligation to pay rent or use and occupancy to Plaintiff.

15. I submit this affidavit to clarify my status, to correct the record, and to oppose any attempt to impose liability upon me in the absence of a legally cognizable basis.

I declare under the pains and penalties of perjury that the foregoing is true and correct.

Dated: April 6, 2026

/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2026 a copy of the foregoing was served electronically on all counsel of record.

Lisa M. Gouveia, Esq. (*Counsel for Plaintiff Lenox Farms Limited Partnership*)
Email: lgouveia@slglegalgroup.com

Grant B. Hecht, Esq. (*counsel for Mohamed Kassem*)
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Respectfully submitted,

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/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)