

**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'S PROTECTIVE MOTION REGARDING APPEAL BOND

Defendant Danny Abouelkhier, appearing pro se, respectfully moves, to the extent any appeal bond is deemed required under G.L. c. 239, § 5, that any such bond be waived or reduced.

This motion is filed solely to preserve Defendant's rights and shall not be construed as a concession that any appeal bond is presently required, that any final judgment has entered, or that G.L. c. 239, § 5 applies.

Defendant further represents that he is unable to pay any appeal bond.

Respectfully submitted,

Danny Abouelkhier

Defendant, Pro Se

550 Liberty Street, Unit 905

Braintree, MA 02184

Email: danytaw@yahoo.com

Dated: April 27, 2026

/s/ Dany Abouelkhier

Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 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*)
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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)