

COMMONWEALTH OF MASSACHUSETTS

ESSEX, SS.

SUPERIOR COURT
DOCKET # 2577CV01253 **A**

K. F., a minor, by his mother,
SANDRA FERNANDEZ DE VILLAVICENCIO,
and SANDRA FERNANDEZ DE VILLAVICENCIO,
individually

Plaintiffs,

v.

CUBE 3 STUDIO LLC,

Defendant

**DEFENDANT CUBE 3 STUDIO LLC'S
RULE 9A(a)(6) PLEADING FOR LEAVE OF COURT
TO EXCEED FIVE-PAGE LIMIT IN REPLY**

To: Session Clerk
ATTN: Session Judge

Now comes Defendant Cube 3 Studio LLC ("Cube 3") and, pursuant to Superior Court Rule 9A(a)(6), requests leave of court to exceed five pages in its reply to the named plaintiffs' ("Plaintiffs") opposition to Cube 3's motion for summary judgment, which is currently undergoing the Rule 9A process.

Specifically, Cube 3 requests leave to write **a reply up to ten pages**, not including counsel's signature and the certificate of service. As grounds, Cube 3 received 18 pages of opposition materials from Plaintiffs which include, among other things, an argument of a new "separate improvement" in response to Cube 3's statute of repose defense. Plaintiffs do not object to this request to exceed page limit. See Exh. A.

Date: March 10, 2026

Respectfully submitted,
The Defendant,
Cube 3 Studio LLC
By its Attorneys,

/s/ Michael P. Schaefer
Michael P. Schaefer, Esq.,
BBO No. 711910
MG+M, The Law Firm
125 High Street
Oliver Street Tower, 6th Floor
Boston, MA 02110
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mschaefer@mgmlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2026, I served a true and accurate copy of the foregoing document upon the named plaintiffs via email and first-class mail as follows:

Sandra Fernandez De Villavicencio, *Individually*
K. F., c/o Sandra Fernandez De Villavicencio
550 Liberty Street, Unit 905
Braintree, MA 02184
sandrev14@yahoo.com

/s/ Michael Schaefer
Michael Schaefer

EXHIBIT A

From: sandra fernandez <sandra14@yahoo.com>
Sent: Wednesday, March 4, 2026 5:50 PM
To: Yue Zheng
Subject: Re: SF KF v. Cube 3 | MSJ reply page limit

EXTERNAL EMAIL NOTICE This E-mail originated from an external source. Please carefully review before clicking links or opening attachments.

Hi Yue,

I do not oppose if the reply is longer than 5 pages.

Thank you for asking,

Sandra F.

Sent from my iPhone

On Mar 4, 2026, at 5:42 PM, Yue Zheng <yzheng@mgmlaw.com> wrote:

Hi Sandra,

If we need to exceed the 5 page limit (not certain yet) for our reply to your opposition to our MSJ, would you be okay with that? There are several topics to cover, and we want to be thorough.

We'll figure out soon how many pages we need (it won't be a huge number). I'm asking ahead of time because the ideal practice is we need to get the court's approval to exceed page limit, and that can take a couple of days.

Please let know, and thanks.

Yue Zheng | MG+M The Law Firm

Associate

617 406 4647 | YZheng@mgmlaw.com

125 High Street, Oliver Street Tower, 6th Floor, Boston, MA 02110

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