

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

Essex, ss.

Civil Action No.: 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.

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS AND
INSURANCE DISCLOSURES**

Pursuant to Mass. R. Civ. P. 26, 34, and 37, Plaintiffs K.F., a minor, by his mother and next friend, and Sandra Fernandez de Villavicencio (collectively, "Plaintiffs"), respectfully move for an order compelling Defendant Cube 3 Studio LLC ("Cube 3") to produce responsive documents and insurance disclosures that are overdue and improperly withheld. Insurance disclosures are mandatory under Rule 26(b)(2) and may not be withheld on confidentiality grounds.

As set forth below, Cube 3 has refused to produce any substantive discovery unless a blanket protective order is entered, despite no protective order being in place and despite Cube 3 never having moved for such relief. Plaintiffs attempted in good faith to resolve this dispute without court intervention and invited Defendant to propose narrowly tailored confidentiality protections, but Defendant did not respond.

taken the parties are free to file a request for a protective order and for request to extend discovery and other deadlines during

3-4-2026 - After review of the pleadings, specifically the plaintiff's reply Brief at Paper #10.2 - the Court DEEMS this motion MOST and No action will be!