

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

Essex, ss.

Civil Action No.: 2577CV01253

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

v.

CUBE 3 STUDIO, LLC,
Defendant.

**AFFIDAVIT OF SANDRA FERNANDEZ DE VILLAVICENCIO IN SUPPORT OF
PLAINTIFFS' EMERGENCY MOTION TO IMPOUND PROPOSED MEDICAL
EXHIBITS AND FOR LIMITED-USE PROTECTION**

I, Sandra Fernandez De Villavicencio, state as follows under the pains and penalties
of perjury:

I have personal knowledge of the facts stated in this affidavit.

I am a Plaintiff in this action, appearing pro se individually and as the mother and
natural guardian of my minor child, Kenzo Fernandez.

I submit this affidavit in support of Plaintiffs' Emergency Motion to Impound
Proposed Medical Exhibits and for Limited-Use Protection re: Plaintiffs' Emergency
Motion to Continue the July 9, 2026 hearings.

Plaintiffs are filing an Emergency Motion to Continue the hearings scheduled for
July 9, 2026 at 2:00 p.m.

The July 9, 2026 hearings concern Defendant CUBE 3 Studio, LLC's pending dispositive motions.

In support of the Emergency Motion to Continue, Plaintiffs seek to submit limited medical documentation concerning my current medical condition, medical follow-up, and medical limitations.

For purposes of Plaintiffs' Emergency Motion to Impound, the proposed medical exhibits are identified as follows:

Proposed Exhibit A — Official medical certificate dated **June 25, 2026**;

Proposed Exhibit B — Certified English translation of the official medical certificate; and

Proposed Exhibit C — Translator certification for the certified English translation.

Proposed Exhibit A contains private medical information concerning my current medical condition, medical care, medical follow-up, and medical limitations.

Proposed Exhibit B translates the private medical information contained in Proposed Exhibit A.

Proposed Exhibit C certifies the English translation identified as Proposed Exhibit B.

Proposed Exhibits A, B, and C are being offered conditionally only because Plaintiffs are requesting emergency scheduling relief concerning the July 9, 2026 hearings.

Proposed Exhibits A, B, and C are not being submitted as discovery responses, expert materials, admissions, impeachment material, or evidence on the merits of Plaintiffs' claims, Defendant's defenses, causation, damages, or any medical issue other than the scheduling issue before the Court.

I do not intend, by submitting Proposed Exhibits A, B, and C for emergency scheduling relief, to waive any privacy right, confidentiality protection, privilege, objection, or other protection concerning medical information.

The public-facing Emergency Motion to Continue describes the general basis for the continuance request without publicly disclosing the private medical contents of Proposed Exhibits A, B, or C.

Public disclosure of Proposed Exhibits A, B, and C would disclose private medical information that is being submitted only for a limited scheduling purpose.

Plaintiffs do not seek to impound the entire case, the civil docket, the parties' names, the Emergency Motion to Continue, or the public memorandum explaining the continuance request.

Plaintiffs seek to impound only Proposed Exhibits A, B, and C.

Redacting the private medical information from Proposed Exhibits A and B would remove the information the Court needs to review in order to evaluate the medical basis for the emergency continuance request.

Plaintiffs seek in camera and impounded review of Proposed Exhibits A, B, and C only as necessary for the Court to decide Plaintiffs' Emergency Motion to Continue and Plaintiffs' Emergency Motion to Impound.

Plaintiffs seek limited-use protection because Proposed Exhibits A, B, and C are submitted solely for the Court's consideration of Plaintiffs' Emergency Motion to Continue, Plaintiffs' Emergency Motion to Impound, any related order, and any related appellate review.

I am not seeking, through this impoundment request, to prevent any party from seeking medical information through proper discovery procedures, subject to any applicable objections, privileges, privacy protections, protective orders, or further order of the Court.

The discovery deadline in this action is currently **November 1, 2027**.

Plaintiffs request that Proposed Exhibits A, B, and C remain impounded until final disposition of this action, including any appellate review, unless modified earlier by further order of the Court.

To the extent the Court requires a date certain for expiration, Plaintiffs request that Proposed Exhibits A, B, and C remain impounded until **December 31, 2031**, unless modified earlier by further order of the Court.

Signed under the pains and penalties of perjury this **7th day of July, 2026**.

/s/ Sandra Fernandez De Villavicencio
Sandra Fernandez De Villavicencio (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on July 7th, 2026 a copy of the foregoing was served electronically
on all counsel of record.

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By: K. F., a minor, by his mother,
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individually

/s/ Sandra Fernandez De Villavicencio
Sandra Fernandez De Villavicencio (Pro Se)