

Docketed 5/4/2026

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

NORFOLK, ss.

Civil Action No. 2582CV00364

DANY ABOUELHKIER,
Plaintiff,

v.

MARINA BAY RESIDENCES, LLC, BOZZUTO
MANAGEMENT CO., and DELANEY BARRETT,
Defendants,

SANDRA FERNANDEZ’S NOTICE REGARDING
POST-JUDGMENT PARTY STATUS AND JURISDICTION
(Strict Limited Appearance; No Waiver of Rights)

Sandra Fernandez hereby provides notice of the following procedural posture of this action for purposes solely to preserve jurisdictional objections and without invoking the Court’s jurisdiction”

1. By Order dated November 20, 2025, the Court added Sandra Fernandez as a party to this action.

2. Sandra Fernandez timely objected to such inclusion, expressly contesting jurisdiction and appearing only under a strict limited appearance.

3. On February 17, 2026, the Court entered judgment in this matter.

4. On March 4, 2026, the Court expressly RESERVED on the issue of whether Sandra Fernandez was properly before the Court.

Accordingly, the record reflects that judgment was entered prior to a determination of whether Sandra Fernandez was properly subject to the Court's jurisdiction.

Sandra Fernandez respectfully notes that, to the extent jurisdiction was not established at the time of judgment, such judgment is void as to her.

This Notice is submitted solely to preserve jurisdictional and appellate rights and shall not be construed as consent to jurisdiction, waiver of rights, or participation on the merits.

Respectfully submitted,

SANDRA FERNÁNDEZ, *PRO SE*,

550 Liberty St. Unit 905
Braintree, MA 02184

Tel: (617) 806 6566

Email: sandreva14@yahoo.com

Date: April 30, 2026

/s/ Sandra Fernandez
Sandra Fernandez

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2026 a copy of the foregoing was served electronically on all counsel of record.

DEFENDANT,
MARINA BAY RESIDENCES, LLC,
BY ITS ATTORNEYS,

Daniel P. Dain, BBO# 632411
Kate Moran Carter, BBO# 663202
Dain, Torpy, Le Ray, Wiest & Garner, P.C.
175 Federal Street, Suite 1500
Boston, MA 02110
ddain@daintorpy.com
kcarter@daintorpy.com
P: (617) 542-4800
F: (617) 542-4808

Gregory P. Sapire (*Pro Hac Vice*)
Raj Aujla (*Pro Hac Vice*)
Maynard Nexsen P.C.
2500 Bee Caves Rd., Bldg. 1, Ste. 150
Austin, TX 78746
gsapire@maynardnexsen.com
raujla@maynardnexsen.com
P: (512) 969-6540
F: (512) 359-7996

DEFENDANTS,
BOZZUTO MANAGEMENT CO. and
DELANEY BARRETT
BY THEIR ATTORNEYS,

Ted Papadopoulos, BBO# 671506
AMPS Law, P.C.

304 Cambridge Road, Suite 440
Woburn, MA 01801
ted@ampslaw.com

P: (781) 756-6600
F: (888) 756-6680

James Bragdon (*Pro Hac Vice*)
Sangita Kannan (*Pro Hac Vice*)
Gallagher Evelius & Jones LLP
218 N. Charles Street, Suite 400
Baltimore, MD 21201
jbragdon@gejlaw.com
skannan@gejlaw.com
P: (410) 727-7702
F: (410) 468-2786

SANDRA FERNÁNDEZ, *PRO SE*

/s/ Sandra Fernandez
Sandra Fernandez