

Docketed 07/03/2025

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

NORFOLK, ss.

Civil Action No. 2582CV00364

DANY ABOUELHKIER, Pro Se,

Plaintiff-Appellant,

v.

MARINA BAY RESIDENCES, LLC, BOZZUTO

MANAGEMENT CO., and DELANEY BARRETT,

Defendants,

**RENEWED SPECIAL APPEARANCE, RESERVATION OF RIGHTS, AND OBJECTION
TO SEVERANCE**

Plaintiff **Dany Abouelkhier** respectfully renews his **special appearance**, full **reservation of rights**, and continuing **objection to the severance** of his individual claims into this new action.

Plaintiff states as follows:

1. The severance of Plaintiff's claims into this docket was initiated without his informed consent and was based on actions taken by Plaintiff's former counsel, who has since been discharged.

2. Plaintiff has objected to this severance from the outset, including through filings under **Mass. R. Civ. P. 60(b), 54(b)**, and through written objections and motions filed in the original case (2382CV00389).

3. The creation of this severed docket has subjected Plaintiff to ongoing retaliation, litigation pressure, and the threat of default on counterclaims while appellate review is pending.

4. Plaintiff reasserts his objection to this Court's jurisdiction over this severed matter, and files this notice under protest solely to preserve his rights and objections.

Respectfully submitted,

Dany Abouelkhier (Pro Se)
550 Liberty St. Unit 905
Braintree, MA 02184
Tel: (617) 909-7799
Email: danytaw@yahoo.com
Date: June 30th, 2025

/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on June 30th, 2025 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.
ddain@daintorpy.com
kcarter@daintorpy.com

Gregory P. Sapire (*Pro Hac Vice*)
Raj Aujla (*Pro Hac Vice*)
Maynard Nexsen P.C.
gsapire@maynardnexsen.com
raujla@maynardnexsen.com

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

Ted Papadopoulos, BBO# 671506
AMPS Law, P.C.
ted@ampslaw.com.

James Bragdon (*Pro Hac Vice*)
Gallagher Evelius & Jones LLP
Sangita Kannan (*Pro Hac Vice*)
jbragdon@gejlaw.com
skannan@gejlaw.com

/s/ Dany Abouelkhier
Dany Abouelkhier (Pro Se)