

**COMMONWEALTH OF MASSACHUSETTS  
THE TRIAL COURT**

SUPERIOR COURT DEPARTMENT

PLYMOUTH, ss.

Civil Action No.: 2583CV00969

**SANDRA FERNANDEZ,**  
Plaintiffs,

v.

**KECHES LAW GROUP, P.C., and  
JOHNATHAN D. SWEET, Esq.,**  
Defendants.

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**PLAINTIFF'S EMERGENCY MOTION TO CONTINUE HEARING**

Plaintiff Sandra Fernandez respectfully moves this Honorable Court for a continuance of the Hearing for Judgment on the Pleadings presently scheduled for June 4, 2026.

Good cause exists for the requested continuance because Plaintiff is currently outside Massachusetts undergoing ongoing medical treatment. Due to her present medical condition, treatment schedule, and related limitations, Plaintiff is unable to adequately prepare for or meaningfully participate in the scheduled hearing, whether in person or remotely.

This request is made in good faith and not for purposes of delay. Plaintiff's inability to participate arises from circumstances beyond her control. Plaintiff submits this request promptly upon determining that her ongoing treatment and current condition would prevent meaningful participation in the June 4, 2026 hearing.

Proceeding with the hearing under these circumstances would substantially impair Plaintiff's ability to meaningfully participate and be heard regarding the issues raised by Defendants' motion, despite Plaintiff's diligence in attempting to participate in these proceedings. A continuance is therefore necessary to ensure a fair opportunity for Plaintiff to present her position before the Court rules on the pending motion.

By contrast, a continuance will not materially prejudice Defendants. Plaintiff seeks only a postponement of the hearing and does not seek any substantive ruling or litigation advantage through this motion. Granting a continuance will not affect the merits of the case, alter any substantive rights of the parties, or impair Defendants' ability to present their arguments at a later hearing date. The requested relief is limited to permitting the matter to be heard when Plaintiff is able to meaningfully participate.

Plaintiff has contacted Defendants' counsel regarding the requested continuance and has requested their position. Should the Court deem additional support necessary, Plaintiff is prepared to promptly obtain and submit appropriate documentation from her treating medical providers in support of this request.

Under these circumstances, good cause exists for a continuance so that the matter may be decided after all parties have had a fair and meaningful opportunity to be heard.

**WHEREFORE**, Plaintiff respectfully requests that this Honorable Court:

- A. Continue the Hearing for Judgment on the Pleadings currently scheduled for June 4, 2026;
- B. Reschedule the hearing to a date after July 15, 2026, or such other date as the Court deems appropriate;

- C. Grant such further scheduling relief as the Court deems just and proper; and
- D. Grant such other and further relief as justice may require.

Respectfully submitted,

Sandra Fernandez,

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June 3rd , 2026

**/s/ Sandra Fernandez**  
Sandra Fernandez

## CERTIFICATE OF SERVICE

I hereby certify that on June 3rd, 2026 a copy of the foregoing was served electronically on all counsel of record.

**Eyal Schwartz**

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By: **/s/ Sandra Fernandez**

Sandra Fernandez