

4/2/26

12

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

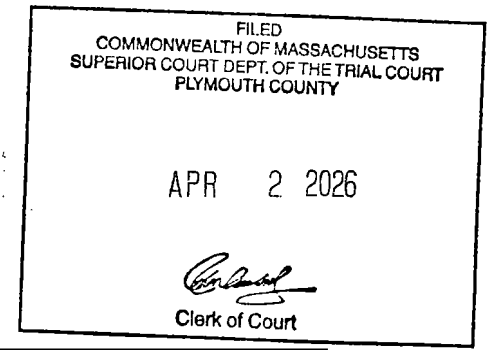
PLYMOUTH, ss.

Civil Action No.: 2583CV00969

SANDRA FERNANDEZ,
Plaintiffs,

v.

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



PLAINTIFF'S LIMITED OPPOSITION TO DEFENDANTS'
MOTION TO STAY DISCOVERY

Plaintiff Sandra Fernandez ("Plaintiff"), appearing pro se, submits this limited opposition to Defendants' Motion to Stay Discovery.

1. Plaintiff agreed to a temporary pause, but did not assent to the motion.

Defendants' Rule 9A filing states that no opposition was received. That characterization is incomplete. Plaintiff's position was communicated prior to filing and was clear that she did not assent to the motion as drafted. A true and correct copy of that communication is attached as Exhibit A.

Prior to filing, Plaintiff expressly communicated that she was willing to proceed with a temporary, informal pause in discovery while the Court considers the pending dispositive motion. However, Plaintiff did not assent to the motion as drafted and objected to the inclusion of unnecessary and inaccurate factual assertions not required for the limited procedural relief sought.

2. The motion exceeds the scope of the relief requested.

The motion goes beyond a straightforward request to temporarily stay discovery and instead includes factual assertions that are both inaccurate and irrelevant. For example, it refers to Mr. Abouelkhier as Plaintiff's "husband," which is incorrect, and includes references to non-parties that have no bearing on whether discovery should be stayed. A procedural motion of this nature should be narrowly confined to the applicable standard and procedural posture, not used to introduce disputed or extraneous factual content.

3. No motion was necessary to obtain the requested relief.

Plaintiff had already communicated her willingness to proceed with a temporary, informal pause in discovery while the Court considers the pending dispositive motion. In that context, there was no apparent need for motion practice to obtain the requested relief.

Courts and parties benefit when limited procedural matters are addressed efficiently and without unnecessary filings. Here, the issue could have been resolved without court intervention. Instead, Defendants elected to file a motion that expands beyond the narrow procedural request and introduces extraneous factual matter.

Plaintiff remains willing to proceed cooperatively with respect to discovery scheduling and to address any future issues in a practical and efficient manner.

4. Plaintiff does not oppose a narrowly tailored stay.

Plaintiff does not oppose, in principle, a temporary stay of discovery pending resolution of Defendants' Motion for Judgment on the Pleadings. Plaintiff's willingness to

proceed cooperatively, however, should not be construed as assent to a motion containing inaccurate or unnecessary factual characterizations.

WHEREFORE, Plaintiff respectfully requests that the Court:

- (a) clarify that Plaintiff did not assent to the motion as filed;
- (b) decline to adopt or rely upon the unnecessary factual assertions contained in Defendants' motion; and
- (c) grant only such relief, if any, as is narrowly tailored to a temporary stay of discovery.

Respectfully submitted,

Sandra Fernandez,

550 Liberty St., Unit 905
Braintree, MA 02184
(617) 806-6566
sandrea14@yahoo.com

April 2, 2026

/s/ Sandra Fernandez
Sandra Fernandez

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2026 a copy of the foregoing was served electronically on all counsel of record.

Eyal Schwartz
Sherin and Lodgen LLP

One Lincoln Street, 14th Floor

Boston, MA 02111

617.646.2153

eschwartz@sherin.com

By: /s/ Sandra Fernandez
Sandra Fernandez