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COMMONWEALTH OF MASSACHUSETTS

PLYMOUTH, SS

SUPERIOR COURT DEPARTMENT

SANDRA FERNANDEZ,)
)
Plaintiff,)
)
v.)
)
KECHES LAW GROUP, P.C., and)
JONATHAN D. SWEET, ESQ.,)
)
Defendants.)

Civil Action No. 2583CV00969

**DEFENDANTS KECHES LAW GROUP, P.C. AND JONATHAN D. SWEET, ESQ.'S
EMERGENCY MOTION TO ENLARGE TIME FOR RESPONSIVE PLEADING**

(Emergency Motion)

Pursuant to Mass. R. Civ. P. 6(b), defendants Keches Law Group, P.C. and Johnathan D. Sweet, Esq. (together "Keches") move for an enlargement of time for Keches to respond to plaintiff Sandra Fernandez's ("Plaintiff") *Complaint and Jury Demand* (the "Complaint"). Keches needs more time because: (1) the Complaint is long with many allegations and arises from a lengthy and tangled underlying history of litigation; and (2) the upcoming holidays will disrupt Keches' work schedule. Specifically, Keches requests that this Court extend the deadline for Keches' responsive pleading from December 2, 2025, to **January 15, 2026**.

In further support of this motion, Keches states as follows:

1. This matter arises out of the putative class action lawsuit, *Beth Materna, et al. vs. Marina Bay Residences, LLC et al.*, Civil Action No. 82CV00389 – in which the underlying plaintiffs brought claims against their landlord concerning water intrusion. Keches represented the class action plaintiffs – including Plaintiff and her husband, until their removal as would-be class representatives. The removal of the Plaintiff and her husband from the class action lawsuit

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