

1/31/26



sandra frommer

To: gbh granthechtlaw.com >



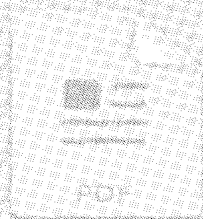
Motion to compel M.K and La Casa zone LLC

Good morning Grant,

Please see attached below motion to compel discovery and insurance disclosure, if you wish to confer this week im available Tuesday and Wednesday or the week after anytime that works for you.

Have a great weekend,

Sandra



**CZ. 01-31-26 M. TO
COMPEL DISCOVERY.pdf**
41 KB



Sent from my iPhone

To: gbh [granthechtlaw.com](mailto:gbh@granthechtlaw.com)
<gbh@granthechtlaw.com>

Subject: Re: Frommer v. La Casa Zone, LLC et al

Dear Grant,

I am writing to follow up on the discovery I served by email on December 23, 2025, including Interrogatories, Requests for Production, and a Request for Insurance Disclosure.

I understand that interrogatory responses are governed by a 45-day response period and are therefore due on or around February 6, 2026. I believe the responses to the Requests for Production and the insurance disclosure were due on January 22, 2026. I have not yet received any responses or objections as to those and wanted to check in case anything was overlooked.

If you could please provide the outstanding document production and insurance disclosure, or advise of the anticipated timing, I would appreciate it. If there are any issues regarding your ability to respond

Re: Frommer v. La Casa Zone, LLC et al

Thank you for the update,

Sandra F.

Sent from my iPhone

On Jan 26, 2026, at 6:49 AM, gbh
[granthechtlaw.com](mailto:gbh@granthechtlaw.com)
<gbh@granthechtlaw.com> wrote:

Ms. Frommer:

You should have all responses by the end of
the week.

Thanks,

Grant B. Hecht
The Law Offices of Grant B. Hecht
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gbh@granthechtlaw.com



sandra frommer

12/15/25

To: gbh.granthechtlaw.com >

Frommer v. Kassem – Discovery Coordination

Good evening Grant,

I would like to begin coordinating discovery if that's ok with you.

Given the nature of the claims, to keep things efficient, I was thinking it might make sense to start in a limited, document-focused way, maybe centered on communications, records, and third-party contacts relevant to the allegations in the Complaint.

Please let me know whether you would prefer to discuss this by phone or proceed in writing. If you have another approach in mind, I am open to discussing it and coordinating in a way that is convenient for everyone.

Have a good night,
Sandra

Sent from my iPhone