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COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

Civil Action No.: 2584CV02961^D

SUFFOLK, ss.

SANDRA FROMMER,
Plaintiff, Pro Se

v.

LA CASA ZONE LLC, and MOHAMED KASSEM,
individually and as manager of La Casa Zone LLC,
Defendants.

PLAINTIFF'S MOTION TO COMPEL DISCOVERY AND INSURANCE DISCLOSURE
WITH MEMORANDUM OF LAW

INTRODUCTION

Plaintiff respectfully moves to compel Defendant Mohamed Kassem and La Casa Zone LLC to respond to Plaintiff's discovery requests and to provide the required disclosure of insurance coverage. Plaintiff made multiple good-faith efforts to coordinate and obtain discovery without court intervention. Despite proper service, follow-up, and Defendants' representation that responses would be provided, Defendants have failed to produce any discovery or insurance disclosure. Court intervention is now necessary to allow this case to move forward.

FACTUAL BACKGROUND

1. On December 15, 2025, prior to serving formal discovery, Plaintiff emailed defense counsel in good faith to initiate discovery coordination and to discuss a limited, document-focused approach to discovery. Defense counsel did not respond.

2/19/26, Plaintiff having complied with Rules 9A and 9C, and defendant having served no opposition to this motion, the motion is allowed, Defendant shall serve responses to the outstanding discovery within 30 days of this order. Court.