

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No.: 2584CV02961^D

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. On December 23, 2025, Plaintiff served Defendant Mohamed Kassim and La Casa Zone with written discovery requests, including Requests for Production, Interrogatories, and a Request for Disclosure of Insurance Coverage.

3. Under the Massachusetts Rules of Civil Procedure, responses to the Requests for Production and the insurance disclosure were due on or about January 22, 2026.

4. Defendants did not serve any responses or objections by that deadline.

5. On January 22, 2026, Plaintiff emailed Defendant Attorney to follow up regarding the overdue discovery. Plaintiff noted that the Requests for Production and insurance disclosure were due.

6. Defendant responded that Plaintiff would receive the requested production and insurance disclosure by the end of that week.

7. As of the date of this motion, no discovery responses, objections, or insurance disclosures have been provided.

MEMORANDUM OF LAW

A. Defendants Are Required to Respond to Discovery

The Massachusetts Rules of Civil Procedure require parties to respond timely to properly served discovery requests and to disclose applicable insurance coverage. Defendants' failure to serve any responses or objections after proper service and expiration of the response deadline warrants an order compelling compliance.

B. Plaintiff Acted in Good Faith

Plaintiff acted reasonably and in good faith by:

- attempting to coordinate discovery before serving formal requests;
- properly serving discovery and insurance disclosure requests;
- following up after the response deadline; and
- relying on Defendants' representation that responses would be provided.

Defendants' continued non-response despite these efforts justifies court intervention.

C. An Order Compelling Discovery Is Appropriate

Defendants' failure to respond has stalled discovery and prejudiced Plaintiff's ability to prepare the case. An order compelling full and complete responses within a firm deadline is appropriate and necessary.

RELIEF REQUESTED

Plaintiff respectfully requests that the Court:

1. Order Defendant Mohamed Kassem and La Casa Zone LLC to serve full and complete responses to Plaintiff's Requests for Production served on December 23, 2025;
2. Order Defendants to provide full disclosure of all applicable insurance coverage, including policy limits and relevant policy information;
3. Set a firm deadline for compliance, such as within 10 or 14 days of the Court's order; and
4. Grant such further relief as the Court deems just and appropriate.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905
Braintree, Massachusetts 02184
sandrafrommer@gmail.com
(617) 806-6566
January 31 , 2026

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on January 31 , 2026 a copy of the foregoing was served electronically on all counsel of record.

Grant B. Hecht, Esq.
Email: gbh@granthechtlaw.com
1443 Beacon Street, Suite 514
Brookline, MA 02446
Tel: (617) 487-5801

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905
Braintree, Massachusetts 02184
sandrafrommer@gmail.com
(617) 806-6566

/s/ Sandra Frommer
Sandra's Frommer