

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.

**AFFIDAVIT OF SANDRA FROMMER IN SUPPORT OF MOTION TO COMPEL
DISCOVERY**

(Mass. R. Civ. P. 26, 34, and 37)

I, Sandra Frommer, hereby depose and state as follows under the pains and penalties of perjury:

1. I am the Plaintiff in this action and submit this Affidavit in support of my Motion to Compel Discovery pursuant to Mass. R. Civ. P. 37.
2. On December 15, 2025, I initiated discovery coordination by emailing defense counsel, Attorney Grant B. Hecht, to begin coordinating discovery in good faith. A true and correct copy of that communication is attached as Exhibit A.
3. Defense counsel did not meaningfully coordinate discovery or provide response to my email to facilitate discovery.
4. On December 23, 2025, after receiving no meaningful coordination, I formally served Defendants with written discovery, including:

- Interrogatories;
- Requests for Production of Documents; and
- Request for Insurance Disclosure.

5. The Requests for Production and Insurance Disclosure responses were due after 30 days.

6. Defendants failed to serve any responses, objections, or disclosures within the required time period.

7. On January 26, 2026, I followed up in writing with defense counsel regarding Defendants' failure to respond. Defense counsel represented that responses would be provided by the end of that week and I answered the email.

8. Defendants failed to provide any responses by that time or thereafter.

9. On January 31, 2026, after continued noncompliance, I served Defendants with a Motion to Compel Discovery and again offered to confer in good faith regarding the outstanding discovery.

10. Since January 26, 2026, Defendants have not provided any discovery responses, objections, insurance disclosures, or any communication regarding compliance.

11. Defendants' failure to respond has continued despite multiple good faith efforts to resolve the matter without Court intervention.

12. As of the date of this Affidavit, Defendants remain in violation of their discovery obligations under the Massachusetts Rules of Civil Procedure.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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Braintree, Massachusetts 02184
sandrafrommer@gmail.com
(617) 806-6566
February 18, 2026

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on February 18 , 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

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/s/ Sandra Frommer
Sandra's Frommer