

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No.: 2584CV02961

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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 NOTICE OF STATUS AND REQUEST FOR CASE MANAGEMENT

CONFERENCE

Now comes the Plaintiff, Sandra Frommer, pro se, and respectfully submits this Notice of Status to apprise the Court of the current posture of this matter and to request limited case management:

1. This action was commenced on October 27, 2025 and remains assigned to DCM Track A (Average).
2. Plaintiff timely served written discovery on Defendants in December 2025, including Requests for Production of Documents and requests for insurance disclosure pursuant to applicable rules.
3. As of the date of this filing, Defendants have not produced responsive documents or insurance information, and no discovery schedule has been established by the Court.

4. No Rule 16 or other case management conference has yet been scheduled, and the parties have received no court-ordered discovery deadlines.

5. Plaintiff seeks to move this case forward efficiently and in accordance with the Court's docket management practices, while preserving all rights and claims asserted in the complaint.

Accordingly, Plaintiff respectfully requests that the Court schedule a brief case management conference for the limited purposes of:

- setting reasonable discovery deadlines;
- addressing outstanding discovery issues; and
- establishing next procedural steps for orderly progression of the case.

This request is made in good faith to promote judicial efficiency and does not waive any rights, defenses, or pending positions of the Plaintiff.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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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.

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Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer
Sandra's Frommer