

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss:

HOUSING COURT DEPARTMENT
METRO SOUTH DIVISION
CIVIL ACTION
NO. 26H82CV00012

LENOX FARMS LIMITED PARTNERSHIP,
Plaintiff,

v.

SANDRA FROMMER,
Defendant.

PLAINTIFF'S PROPOSED ORDER

The Plaintiff, at the hearing of this action, presented evidence that the allegations contained in its Complaint for Contempt were true and accurate and that the Defendant has failed to comply with this Court's Order dated March 17, 2026.

1. The Plaintiff, Lenox Farms Limited Partnership is the owner and managing agent, of the premises located at 550 Liberty Street, #905, Braintree, MA 02184 (hereinafter "premises").
2. Mohamed Kassem is the only authorized occupant of the premises pursuant to the written lease agreement with the Plaintiff.
3. Sandra Frommer is alleged by the Plaintiff in summary process docket number 24H82SP03575 to be an unauthorized individual of the premises.
4. Upon the filing of Sandra Frommer's Motions to Intervene in summary process docket number 24H82SP03575 and an evidentiary hearing on July 18, 2025 regarding her Motion, this Court denied Sandra Frommer's motion finding that she failed to provide any evidence of a tenancy with the Plaintiff including the lack of a signed lease, evidence of rent payment and/or written communications from the Plaintiff demonstrating a tenancy agreement with her.

5. The Defendant, Sandra Frommer has no right to possession of the premises and no tenancy relationship with the Plaintiff.
6. The Plaintiff has not provided any authorization, written or otherwise to Sandra Frommer to allow Defendant, Sandra Frommer to reside in the premises.
7. The Plaintiff has also not accepted any monies from Defendant, Sandra Frommer.
8. On November 11, 2025, the Plaintiff, through counsel, served the Defendant, via Constable, with a 72-Hour Notice to Quit and Vacate Premises as she has taken occupancy of the premises without the permission of the Plaintiff, and she has remained in possession.
9. There has been no tenancy created by and between the parties.
10. After the hearing of this action on March 2, 2026, this Honorable Court entered an Order against the Defendant, thereby ordering that “the Defendant, Sandra Frommer, is hereby enjoined from entering, residing, and/or remaining on the premises located at 550 Liberty Street, Apartment 905, Braintree, MA 02184.
11. The Defendant received a copy of said Order on March 27, 2026 via constable as well as a copy from the Court.
12. The Defendant did not appear at this hearing, but filed numerous motions with the Court that have been denied after hearing.
13. The Defendant has also filed numerous motions with the Appeals Court attempting to stay these proceedings which have been denied.
14. There is an outstanding balance of use and occupancy due for the premises in excess of \$99,358.00.

15. As of this date, the Defendant has not vacated the premises and has failed to comply with this Court's Order dated March 17, 2026.

WHEREFORE, it is hereby ORDERED that:

1. Defendant is in contempt of this Court's Order dated March 17, 2026;
2. Judgment enter in favor of the Plaintiff;
3. An Execution for Possession issue to the Plaintiff as against Sandra Frommer within thirty (30) days of this Order; and
4. This Order shall become effective on _____.

SO ORDERED:

, Presiding Justice

Date: _____