

**COMMONWEALTH OF MASSACHUSETTS
HOUSING COURT DEPARTMENT
METRO SOUTH DIVISION**

NORFOLK, SS.

DOCKET No. 26H82CV00012

LENOX FARMS LIMITED PARTNERSHIP,

Plaintiff,

v.

SANDRA FROMMER,

Defendant.

**AFFIDAVIT OF SANDRA FROMMER EMERGENCY MOTION FOR STAY OF
EXECUTION AND ENFORCEMENT PENDING APPEAL AND REQUEST FOR
IMMEDIATE PRESENTMENT**

I, Sandra Frommer, state under the pains and penalties of perjury:

1. I am the Defendant in this case.
2. I live at 550 Liberty Street, Unit 905, Braintree, Massachusetts, with my minor child.
3. I have lived there as my home and have had access to the unit.
4. Management has communicated with me and is aware of my presence in the unit.
5. I have made or facilitated payments related to the premises.
6. I have not received clear notice of the operative court order, including whether it is a Temporary Restraining Order or a Preliminary Injunction, or when it became effective.

7. I became aware of the current status through review of the docket.
8. I have filed a Notice of Appeal and a Motion to Stay.
9. My minor child is homeschooled and dependent on me.
10. My child and I have recently been sick.
11. I have experienced two recent family deaths.
12. I have filed an Affidavit of Indigency and applied for RAFT assistance.
13. If enforcement occurs, my child and I will be immediately displaced and face homelessness.

I declare under the pains and penalties of perjury that the above is true and correct.

Sandra Frommer

Date: March 24, 2026

/s/ Sandra Frommer
Sandra Frommer (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on March 24, 2026 a copy of the foregoing was served electronically on all counsel of record.

Lisa M. Gouveia, Esq. (*Counsel for Plaintiff Lenox Farms Limited Partnership*)
Email: lgouveia@slglegalgroup.com

Respectfully submitted,

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/s/ Sandra Frommer
Sandra Frommer (Pro Se)