

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

NORFOLK, SS.

DOCKET No. 26H82CV00012

LENOX FARMS LIMITED PARTNERSHIP,

Plaintiff,

v.

SANDRA FROMMER,

Defendant.

**DEFENDANT SANDRA FROMMER'S (SPECIAL APPEARANCE) EMERGENCY
MOTION TO VACATE TEMPORARY RESTRAINING ORDER AND/OR PRELIMINARY
INJUNCTION AS VOID, AND FOR RELATED PROTECTIVE**

Sandra Frommer, appearing specially and without submitting to the jurisdiction of this Court, respectfully moves to vacate any Temporary Restraining Order and/or Preliminary Injunction reflected on the docket (including entries dated March 2, 2026), and states as follows:

I. LIMITED APPEARANCE; NO WAIVER

This motion is made solely to challenge jurisdiction, service, and the validity of orders.

It is not a general appearance and does not waive any defenses, including lack of personal jurisdiction.

This appearance shall not be construed as consent to jurisdiction, party status, joinder, consolidation, coordination-as-consolidation, or participation in any proceeding, nor as consent to any filing, representation, or association with any other individual, party, or third party.

II. RELIEF REQUESTED

Ms. Frommer respectfully requests that the Court:

1. Vacate any Temporary Restraining Order and/or Preliminary Injunction entered on or about March 2, 2026 as void;
2. Stay enforcement immediately pending resolution of jurisdiction and record defects;
3. Refrain from further action or reliance on the current docket absent proper service and a complete, reliable record; and
4. Grant such further relief as is just.

III. GROUNDS FOR VACATUR

A. Lack of Proper Service – No Personal Jurisdiction

The docket reflects a “Return of service PI Hearing completed” (Entry No. 4, dated February 25, 2026).

However:

- Ms. Frommer has not been served with a summons as required by Mass. R. Civ. P. 3 and 4;
- She has not been served with the complaint in a manner sufficient to establish personal jurisdiction; and

- She has not been served with any Temporary Restraining Order or Preliminary Injunction.

To the extent any return of service has been filed, its sufficiency and accuracy are expressly disputed.

Accordingly, the Court lacks personal jurisdiction, and any resulting order is void pursuant to Mass. R. Civ. P. 60(b)(4).

B. Injunctive Relief Entered Without Proper Notice and Due Process

The docket reflects that injunctive relief was allowed on March 2, 2026.

Such relief, entered without proper service and notice, violates fundamental due process requirements and cannot stand.

C. Systemic Docket Irregularities and Unreliability

The docket reflects multiple duplicative, inconsistent, and unclear entries, including:

- repeated entries for the same hearing;
- conflicting designations (e.g., “held” and “allowed – TRO or PI”); and
- unclear procedural sequencing.

These irregularities render the docket unreliable.

No action should be taken in reliance on a docket that is internally inconsistent, duplicative, or unclear.

D. Missing and Inaccessible Filings (Entry No. 28)

As of this filing:

- Docket Entry No. 28 (Affidavit of Indigency) is missing or inaccessible; and
- other filings cannot be reviewed.

This renders the record incomplete.

No action should be taken based on an incomplete or inaccessible record.

E. No Consent; No Joinder; No Attribution

Ms. Frommer:

- did not authorize any filings by others;
- does not consent to joinder, consolidation, or merging of proceedings;
- does not consent to any filing being made in her name; and
- does not consent to any association with other individuals or third parties.

Any such actions are unauthorized and expressly rejected.

F. Clarification of Prior Motion (Docket Entry No. 12 – 03/03/2026

Prior motion to coordinate related actions was strictly limited to scheduling awareness and procedural coordination only.

It did not and does not constitute consent to consolidation, joinder, transfer, or merger.

Any contrary interpretation is incorrect and expressly rejected.

G. Protection Against Cross-Docket Attribution or Manipulation

Ms. Frommer objects to any attempt to:

- merge or transfer claims across dockets;
- attribute filings or positions between individuals; or
- associate her with other parties without due process.

Each individual's rights are separate and independent.

H. Improper Joint Filings and Attribution

Certain filings appear to be presented as joint filings or as being submitted on behalf of multiple individuals.

Ms. Frommer:

- did not file, join, or authorize any joint filing;
- does not consent to any joint representation or filing; and
- does not consent to attribution of positions or arguments to her by any other

person.

Any such representation is incorrect, unauthorized, and expressly rejected.

The Court is respectfully requested to treat all filings as separate and not attribute any joint appearance, consent, or position to Ms. Frommer.

IV. AFFIRMATIVE FACTUAL DISPUTE

Ms. Frommer states, based on personal knowledge:

- she has not been served with a summons;
- she has not been properly served with the complaint;
- she has not been served with any TRO or Preliminary Injunction order;
- she did not receive adequate notice of injunctive relief;
- she disputes the accuracy and sufficiency of any return of service;
- she has not had access to all docket filings; and
- she does not consent to any filings or representations not made directly by her.

V. CLARIFICATION OF SERVICE AND APPEARANCE ACROSS DOCKETS

Ms. Frommer further states that:

- she has not been served with a summons in this or, to her knowledge, any related Housing Court matter;
- any filings made by her were limited and protective only;
- she does not appear on behalf of any other individual; and

- she does not consent to being associated across dockets without proper service and adjudication.

VI. LIMITED SCOPE OF RELIEF REQUESTED

Ms. Frommer seeks relief only as to the Temporary Restraining Order and/or Preliminary Injunction entered against her.

Nothing in this motion should be construed as:

- a request to vacate any filings submitted by Ms. Frommer;
- a request to alter unrelated orders; or
- a waiver of any rights, claims, or defenses.

VII. PRESERVATION OF APPELLATE RIGHTS

The injunction order constitutes the primary source of ongoing harm and, if left in place, risks distorting or mooted related appellate proceedings.

Vacatur is necessary to preserve meaningful appellate review.

VIII. CONCLUSION

Because:

- service is defective;
- personal jurisdiction is lacking;
- the docket is unreliable; and
- the record is incomplete,

the TRO/Preliminary Injunction is void and must be vacated.

Nothing in this motion, or in any prior filing by Ms. Frommer, shall be construed as:

- a waiver of any rights, defenses, or objections in this matter or in any other proceeding;

- a consent to jurisdiction in this or any other docket;
- a consent to joinder, consolidation, transfer, or merger of proceedings;
- a consent to being treated as a party in any other action; or
- a consent to any filing, representation, or attribution made by any other

individual.

Any prior filings by Ms. Frommer were made solely for limited and protective purposes and shall not be construed to expand the scope of her participation, waive objections, or create any form of joint or consolidated proceeding.

Ms. Frommer expressly maintains that her rights, claims, and defenses are independent, non-transferable, and not subject to consolidation or attribution absent proper service and adjudication.

Respectfully submitted,

Sandra Frommer
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Braintree, MA, 02184
(617) 806-6566
sandrafrommer@gmail.com
Date: March 25, 2026

/s/ Sandra Frommer
Sandra Frommer (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on March 25, 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)