

**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 IN SUPPORT OF EMERGENCY STAY AND TO
CORRECT AND COMPLETE THE RECORD**

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

I. PURPOSE OF THIS AFFIDAVIT

1. This affidavit is submitted to correct and complete the factual record upon which the Court's March 17, 2026 order was entered.
2. Specifically, this affidavit addresses the Court's finding that there were no written communications demonstrating authorization or a tenancy relationship, and that the record was "undisputed."
3. The facts set forth below establish that written communications from Plaintiff's agents do exist and directly relate to occupancy, authorization, and the presence of a minor at the premises.

II. WRITTEN COMMUNICATIONS FROM PLAINTIFF REGARDING THE MINOR
AND OCCUPANCY

4. Prior to and during my occupancy of the premises, I communicated directly with Plaintiff's on-site management, including Community Director Erika Merritt.

5. In those communications, I specifically inquired about adding my minor child to the lease and what information was required.

6. In response, Plaintiff's agent requested:

"birthdate and full name of the minor."

7. I provided the requested information.

8. Plaintiff's agent then confirmed:

"I will confirm once Kenzo is added."

9. These communications were sent directly by Plaintiff's management and relate to the formal addition of my minor child to the lease and occupancy structure.

10. True and accurate copies of these communications are attached as Exhibit A.

III. THESE COMMUNICATIONS DIRECTLY RELATE TO AUTHORIZATION AND
OCCUPANCY

11. These communications were not incidental or informal.

12. They were part of an ongoing process initiated by Plaintiff's management to:

- identify the minor occupant,

- obtain required personal information, and
- confirm the minor's addition to the lease.

13. At no time during these communications did Plaintiff's agents state that:

- I was unauthorized,
- the minor was unauthorized, or
- occupancy was prohibited.

14. Instead, Plaintiff's agents engaged in the process of formalizing occupancy.

IV. EFFECT ON THE COURT'S "UNDISPUTED RECORD" FINDING

15. The Court's order states that Defendant:

“did not present any evidence of a tenancy such as... written communications from the Plaintiff demonstrating a tenancy agreement.”

16. The communications described above are written communications from Plaintiff's agents directly addressing:

- occupancy,
- the minor's presence, and
- lease-related inclusion.

17. Accordingly, the record is not “undisputed,” and it does not consist solely of the absence of authorization.

18. Rather, the record includes affirmative written communications demonstrating acknowledgment and processing of occupancy by Plaintiff's management.

V. TIMING AND CONTEXT

19. These communications occurred prior to and during occupancy, not after litigation began.

20. They reflect Plaintiff's contemporaneous knowledge of:

- my presence,
- my minor child's presence, and
- the intent to formalize that occupancy.

VI. RELATION TO PENDING PROCEEDINGS INVOLVING A MINOR

21. My minor child is the plaintiff in a pending Superior Court action (2584CV03275) arising from the same premises.

22. The factual basis of that action includes:

- conditions within the unit,
- occupancy,
- and conduct by Plaintiff and its agents.

23. Plaintiff's written communications acknowledging and processing the minor's presence are directly relevant to those claims.

24. Enforcement of the injunction would alter the factual context underlying that action.

VII. ADDITIONAL CONTEXT REGARDING OCCUPANCY AND MANAGEMENT

COMMUNICATIONS

25. Plaintiff's management communicated with me regarding:

- unit access,
- maintenance issues,
- safety concerns, including gas-related issues, and
- occupancy-related matters.

26. These communications further demonstrate that Plaintiff's agents were aware of and interacting with me as an occupant of the premises.

VIII. SUMMARY

27. The record before the Court:

- includes written communications from Plaintiff's agents,
- reflects acknowledgment of occupancy,
- and involves ongoing lease-related processing for a minor occupant.

28. These facts were not reflected in the record as characterized in the Court's order.

29. This affidavit is submitted to ensure that the Court's consideration of further relief, including a stay, is based on a complete and accurate record.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY

Date: March 23, 2026

Sandra Frommer

/s/ Sandra Frommer
Sandra Frommer (Pro Se)

CERTIFICATE OF SERVICE

I hereby certify that on March 23rd, 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*)
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Respectfully submitted,

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/s/ Sandra Frommer
Sandra Frommer (Pro Se)