

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

NORFOLK, ss.

Civil Action No.: 26H82CV00041

SANDRA FROMMER,
Plaintiff, Pro Se

v.

UDR, INC.;
LENOX FARMS LIMITED PARTNERSHIP;
UDR NYL DEALS GP LLC; and
ERIKA MERRITT,
Defendants.

PLAINTIFF'S EMERGENCY MOTION TO CONTINUE (RESCHEDULE) HEARING

The Plaintiff, Sandra Frommer, respectfully moves to continue and reschedule the motion hearing currently scheduled for **April 9, 2026**.

This request is made on an emergency basis due to circumstances beyond Plaintiff's control. As set forth in the accompanying affidavit, Plaintiff's mother has suffered an accident, is hospitalized, and is scheduled to undergo surgery. Plaintiff is required to travel to attend to her and assist during this medical emergency.

Due to these circumstances, Plaintiff is unable to be present due to circumstances beyond Plaintiff's control, despite Plaintiff's intention to proceed with the hearing.

This request is made promptly upon learning of the emergency and is not for purposes of delay, but to allow Plaintiff a fair opportunity to be heard and to participate meaningfully in the proceedings.

Plaintiff respectfully requests that the hearing be continued and rescheduled to the next available date after **April 25th 2026**, when Plaintiff will be available to appear.

MEMORANDUM IN SUPPORT

A continuance may be granted upon a showing of good cause where a party is unable to attend due to circumstances beyond their control and where denial would result in prejudice.

Here, Plaintiff has demonstrated good cause. The medical emergency involving Plaintiff's mother, including hospitalization and scheduled surgery, requires Plaintiff's immediate travel and makes attendance at the scheduled hearing impossible.

Plaintiff acted promptly in bringing this request and seeks only a limited continuance to the next available date after Plaintiff's return. There is no undue prejudice to the opposing party from a short continuance.

Denial of this request would substantially prejudice Plaintiff by preventing her from appearing and being heard in a matter she initiated, while a brief continuance imposes no comparable prejudice on the opposing party.

Under these circumstances, granting a continuance is appropriate to ensure fairness and allow the matter to proceed with full participation by all parties.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905

Braintree, Massachusetts 02184

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(617) 806-6566

April 7, 2026

/s/ Sandra Frommer

Sandra's Frommer

AFFIDAVIT OF SANDRA FROMMER

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

1. My mother has suffered an accident.
2. She is scheduled to undergo surgery.
3. I am required to travel to attend to her and assist during this medical situation.
4. Due to this emergency, I am unable to attend the hearing scheduled for April 9, 2026.
5. I respectfully request a continuance so that I may be present and participate in the proceedings.

April 7, 2026

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on April 7, 2026 a copy of the foregoing was served electronically on all counsel of record.

Lisa M. Gouveia, Esq. (*Counsel for Defendants*)
Email: lgouveia@slglegalgroup.com

25 Braintree Hill Office Park, Suite 205,
Braintree, MA 02184.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer
Sandra's Frommer