

**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 MOTION TO CONTINUE
(WITH INCORPORATED MEMORANDUM)

Plaintiff Sandra Frommer respectfully moves, pursuant to Mass. R. Civ. P. 40(b), to continue the proceedings presently scheduled for May 7, 2026.

This request is made in good faith and is necessitated by ongoing medical and family circumstances presently outside Plaintiff's control which materially impair Plaintiff's ability to return to the jurisdiction, prepare adequately, and participate in the scheduled proceedings.

This motion is submitted without waiver of any preserved objections, defenses, appellate rights, jurisdictional issues, or procedural rights previously asserted or preserved in this matter.

In support thereof, Plaintiff states as follows:

Plaintiff is presently outside the jurisdiction addressing an ongoing family medical matter involving Plaintiff's mother, as previously disclosed to the Court.

While abroad, Plaintiff has also required medical care and is presently undergoing medical evaluation and treatment relating to a medical condition.

Due to these ongoing circumstances and present medical limitations, Plaintiff is not presently able to travel, return to the jurisdiction, or adequately prepare for and participate in the proceedings presently scheduled for May 7, 2026.

Plaintiff's present inability to proceed is not voluntary and remains dependent upon ongoing medical evaluation, treatment recommendations, and provider-directed limitations presently outside Plaintiff's control.

Plaintiff has acted promptly and in good faith in notifying the Court upon recognizing that the present circumstances would materially impair Plaintiff's ability to proceed as scheduled.

Plaintiff respectfully requests a continuance of approximately forty-five (45) days, or such other period as the Court deems appropriate. Plaintiff will promptly notify the Court if circumstances materially change sooner.

If requested by the Court, Plaintiff can request certification or related medical confirmation from her treating physician and provide it to the Court in an appropriate non-public manner due to the sensitive nature of the medical information involved.

MEMORANDUM

A continuance lies within the sound discretion of the Court pursuant to Mass. R. Civ. P. 40(b). Good cause exists where a party's medical circumstances materially impair the party's ability to prepare for or participate adequately in scheduled proceedings.

Good cause exists here. Plaintiff's present medical and family circumstances presently prevent Plaintiff from returning to the jurisdiction, or adequately participating in

the proceedings presently scheduled for May 7, 2026. The request is made promptly, in good faith, and for a limited duration.

Under the present circumstances, denial of a limited continuance would risk material prejudice by requiring proceedings to move forward during a period in which Plaintiff is medically unavailable and unable to participate adequately in the litigation despite prompt notice to the Court and the limited nature of the relief requested.

Granting the requested continuance will promote the fair and orderly administration of the proceedings while avoiding unnecessary prejudice arising from Plaintiff's present medical unavailability.

WHEREFORE, Plaintiff respectfully requests that this Court continue the proceedings presently scheduled for May 7, 2026 for approximately forty-five (45) days, or such other period as the Court deems appropriate, and grant such other relief as justice may require.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905

Braintree, Massachusetts 02184

sandrafrommer@gmail.com

(617) 806-6566

May 5, 2026

/s/ Sandra Frommer
Sandra's Frommer

AFFIDAVIT OF SANDRA FROMMER

I, Sandra Frommer, declare under the pains and penalties of perjury as follows:

I am the Plaintiff in the above-captioned matter.

I am presently outside the jurisdiction addressing an ongoing family medical matter involving my mother.

While abroad, I have also required medical care and am presently undergoing continuing medical evaluation and treatment relating to a serious medical condition.

Due to these ongoing circumstances and present medical limitations, I am not presently able to travel internationally, return to the jurisdiction, or adequately prepare for and participate in the proceedings presently scheduled for May 7, 2026.

My present inability to proceed is not voluntary and remains dependent upon ongoing medical evaluation, treatment recommendations, and provider-directed limitations presently outside my control.

If requested by the Court, I can provide physician certification or related medical confirmation directly to the Court in an appropriate non-public manner due to the sensitive nature of the medical information involved.

Signed under the pains and penalties of perjury this 5th day of May, 2026.

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on May 5th, 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