

**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 JUNE 25, 2026 HEARING FOR
MEDICAL REASONS WITH INCORPORATED MEMORANDUM**

Plaintiff Sandra Frommer respectfully moves, pursuant to Mass. R. Civ. P. 40(b), to continue the motion hearing scheduled for June 25, 2026 at 9:00 a.m.

This request is made in good faith and is not made for purposes of delay. Plaintiff files this motion today, before the hearing date, because the hearing is scheduled for tomorrow morning and the official medical certificate from Plaintiff's treating physician is expected to be completed and available early tomorrow morning, before the Court opens.

Plaintiff states as follows:

This matter is scheduled for a motion hearing on June 25, 2026 at 9:00 a.m.

Plaintiff is presently outside the United States and is under medical care and treatment.

Plaintiff previously advised the Court that she was abroad, undergoing medical evaluation and treatment, and medically unable to travel, return to Massachusetts, adequately prepare, or participate in the scheduled proceedings.

Plaintiff requested physician certification more than one week ago and has been awaiting completion of the official certificate by her treating physician.

The official medical certificate is expected to be completed and available early tomorrow morning, June 25, 2026. Plaintiff will file the certificate separately immediately upon receipt and will request impoundment because it contains private medical information.

The timing of the certificate is due to the physician's completion of the official certificate, not lack of diligence by Plaintiff.

The certificate is being issued in Spain on the official Spanish medical certificate form.

Plaintiff's present medical condition prevents her from meaningfully preparing for or participating in the June 25, 2026 hearing, including by Zoom, because the hearing requires sustained attention, participation, and response to the Court and opposing counsel.

Plaintiff is not asking the Court to close the case or stay it indefinitely. Plaintiff respectfully requests that the June 25, 2026 hearing be continued and rescheduled to a date the Court deems appropriate in light of the forthcoming medical documentation and Plaintiff's present inability to participate meaningfully.

Plaintiff does not seek to waive any preserved objections, defenses, appellate rights, jurisdictional objections, or procedural rights previously asserted in this matter.

MEMORANDUM

Under Mass. R. Civ. P. 40(b), a continuance may be granted for good cause. Good cause exists where a party's medical condition materially impairs the party's ability to prepare for or participate adequately in scheduled proceedings.

Housing Court rules should be applied in a fair, reasonable, and practical manner. Good cause exists here because Plaintiff's present medical incapacity, her location outside the United States, and the pending official medical certificate materially affect her ability to participate meaningfully in the scheduled hearing.

This request is not based on convenience or delay. Plaintiff requested physician certification more than one week ago, is filing this motion before the hearing date, and will file the official certificate separately immediately upon receipt with a request for impoundment.

The fact that the hearing is scheduled by Zoom does not eliminate the prejudice. Plaintiff's present medical condition prevents meaningful participation in a hearing requiring sustained attention, response to the Court, and response to opposing counsel.

Denial of a continuance under these circumstances would materially prejudice Plaintiff by requiring the matter to proceed while Plaintiff is medically unable to participate meaningfully. A continuance will preserve the orderly administration of the case while avoiding prejudice from Plaintiff's documented medical incapacity.

WHEREFORE, Plaintiff respectfully requests that the Court continue the June 25, 2026 hearing and reschedule the matter for a status or motion hearing on a later date deemed appropriate by the Court in light of the forthcoming medical certification, and grant such other relief as justice may require.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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Braintree, Massachusetts 02184

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(617) 806-6566

June 24, 2026

/s/ Sandra Frommer

Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on June 24th, 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

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Braintree, MA 02184.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer
Sandra's Frommer