

**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.

**AFFIDAVIT OF SANDRA FROMMER IN SUPPORT OF PLAINTIFF'S EMERGENCY
MOTION**

I, Sandra Frommer, hereby depose and state as follows:

1. PERSONAL KNOWLEDGE

1. I am the Plaintiff in this action.
2. I have personal knowledge of the facts set forth herein.

2. ORIGINATING SUPERIOR COURT ACTION

3. This action originated in Suffolk Superior Court as Docket No. 2584CV03086.
4. The case was filed on November 6, 2025.
5. My Affidavit of Indigency was allowed in that action.

6. Service of process was completed and returned in hand on December 1, 2025.

7. Defendants filed an Answer on December 5, 2025.

8. The case was therefore joined and actively litigated prior to transfer.

3. PROCEDURAL ACTIVITY PRIOR TO TRANSFER

9. I filed additional procedural notices and filings in December 2025 addressing the posture of the case and reserving rights.

10. The matter was the subject of proceedings in the Appeals Court under G.L. c. 231, § 118 concerning the transfer of the case.

4. TRANSFER TO HOUSING COURT

11. On or about February 12, 2026, the action was transferred to the Housing Court and assigned Docket No. 26H82CV00041.

12. The Housing Court docket reflects the case as a “Civil Case Transfer” with entries such as “Civil Complaint filed” and “Entire Case Scanned.”

5. CURRENT DOCKET DOES NOT REFLECT OPERATIVE POSTURE

13. The Housing Court docket does not reflect, on its face:

- the original November 6, 2025 filing date;
- the allowed indigency status;
- completed service of process;
- Defendants’ Answer;

- prior filings;
- or Appeals Court activity relating to the transfer.

14. As presented, the action appears as a newly initiated matter rather than a continuation of a served and joined Superior Court case.

6. PENDING MOTION TO RETRANSFER AND STAY

15. On February 13, 2026, I filed a Motion to Retransfer and Stay.

16. That motion remains pending and has not been ruled upon.

17. The Appeals Court indicated that review of the transfer issue depends on a ruling by the Housing Court.

7. RELATED HOUSING COURT PROCEEDING

18. A related Housing Court action, Docket No. 26H82CV00012, concerns the same premises.

19. That action has advanced to entry of a preliminary injunction affecting possession.

8. PREJUDICIAL SEQUENCING

20. The earlier-filed action (November 6, 2025), which was served and answered, remains pending without a ruling on retransfer.

21. A later-filed proceeding has advanced to exclusionary relief.

22. This creates a situation in which issues affecting possession may be determined in a later action before the Court addresses the posture and forum of the earlier-filed case.

9. NEED FOR PROMPT RULING

23. A ruling on the Motion to Retransfer and Stay is necessary to:

- clarify the proper forum;
- ensure orderly adjudication; and
- prevent prejudice arising from out-of-sequence proceedings.

10. DECLARATION

I declare under the pains and penalties of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Sandra Frommer

Date: March 23, 2026

/s/ Sandra Frommer
Sandra's Frommer

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 Defendants*)
Email: lgouveia@slglegalgroup.com

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

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905
Braintree, Massachusetts 02184
sandrafrommer@gmail.com
(617) 806-6566

/s/ Sandra Frommer
Sandra's Frommer