

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

SANDRA FROMMER,
Plaintiff

**CIVIL ACTION NO.
26H82CV00041**

v.

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

**AFFIDAVIT OF SANDRA FROMMER UNDER THE PENALTIES OF PERJURY IN
SUPPORT OF RECONSIDERATION AND DECISION ON THE WRITTEN SUBMISSIONS**

I, Sandra Frommer, declare under the penalties of perjury pursuant to G. L. c. 268, § 1A, as follows:

1. I am the Plaintiff in this action and have personal knowledge of the matters stated in this declaration.
2. I commenced this action in Suffolk Superior Court as Civil Action No. 2584CV03086. I did not request or consent to its transfer to the Housing Court, and I continue to maintain the transfer, subject-matter-jurisdiction, record-integrity, and procedural objections asserted in Papers 5, 7, and 11.
3. I use the present Housing Court caption, case number, and paper numbers only to identify the filings as they currently appear in the receiving court's record. I do not thereby accept the transfer, the Housing Court as the proper forum, or the completeness, accuracy, or attribution of the present docket.
4. A virtual hearing on Papers 5, 7, and 11 was scheduled for June 25, 2026. On June 24, 2026, I filed Paper 17 requesting a continuance. The docket also reflects my June 25 communication concerning my inability to participate.

5. My medical condition materially prevented me from participating meaningfully in the June 25

virtual hearing. My nonappearance was not intentional, was not a tactical decision, and was not an abandonment of Papers 5, 7, or 11.

6. On June 26, 2026, I filed Paper 23 seeking impoundment of medical materials, together with the medical materials and translation reflected as Papers 24 and 25. I contemporaneously submit the finalized Certified English Translation and Translator's Certification under separate impoundment procedures.

7. I have not previously filed a motion for reconsideration of the June 25, 2026 rulings. This is my first request for reconsideration of those rulings.

8. To permit prompt adjudication without requiring my attendance, I waive oral argument solely on this Motion for Reconsideration and on Papers 5, 7, and 11. I consent to decision on the existing written submissions and, if the Court considers supplementation necessary, to a written opposition-and-reply schedule.

9. I do not ask the Court to allow Papers 5, 7, or 11 because of my medical condition. I ask that the Court consider each paper's actual grounds and enter an express disposition, whether favorable or unfavorable, rather than leave the papers denied solely because I could not participate on June 25.

10. My limited waiver of oral argument is not consent to the transfer, acceptance of the Housing Court as the proper forum, acceptance of the completeness or accuracy of the transferred record, or waiver of any objection or right asserted in Papers 5, 7, and 11.

I declare under the penalties of perjury that the foregoing is true and correct.

/s/ Sandra Frommer

Sandra Frommer

Dated: July 14, 2026

CERTIFICATE OF SERVICE

I hereby certify that on July 14, 2026 a copy of the foregoing was served electronically on all counsel of record.

Lisa M. Gouveia, Esq. (*Counsel for Defendants*)

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Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer

Sandra's Frommer