

**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 IMPOUND MEDICAL CERTIFICATE AND ENGLISH
TRANSLATION SUBMITTED PURSUANT TO PAPER 18 NOTICE**

Plaintiff Sandra Frommer files this Motion by limited and special appearance only to complete the record promised in Paper 18 and to protect private medical information. Nothing in this Motion is a waiver of Plaintiff's objections to transfer, forum, jurisdiction, service, procedural posture, jury-trial rights, medical privacy, physician-patient confidentiality, or appellate rights.

Pursuant to Trial Court Rule VIII (Uniform Rules on Impoundment Procedure) and G.L. c. 214, § 1B, Plaintiff respectfully moves to impound the original medical certificate and English translation submitted separately under impoundment with this filing, designated respectively as (Impounded Attachment A) and (Impounded Attachment B).

Plaintiff has now received the official medical certificate referenced in Paper 18 and submits it herewith to complete the record. This material is submitted solely for the

limited procedural purpose of documenting temporary medical incapacity related to the June 25, 2026 hearing session and related procedural filings.

As grounds for this Motion, Plaintiff states:

1. On June 24, 2026, Plaintiff filed a Motion to Continue the June 25, 2026 hearing session for documented medical reasons (See Housing Court Docket, Paper 17; Exhibit C).

2. On June 25, 2026, before the scheduled hearing session, Plaintiff filed a Pre-Hearing Notice (Paper 18) advising the Court that an official medical certificate had been requested from her treating physician, that it was forthcoming, and that Plaintiff would file it immediately upon receipt (See Housing Court Docket, Paper 18; Exhibit D).

3. Plaintiff submits the original medical certificate (Impounded Attachment A) in fulfillment of the notice provided in Paper 18.

4. Because the original certificate is executed in Spanish, Plaintiff also submits a verified English translation (Impounded Attachment B) for the Court's review.

5. Good cause for impoundment exists under Trial Court Rule VIII because Impounded Attachment A and Impounded Attachment B contain private medical information concerning Plaintiff.

6. Plaintiff submits these materials only for the limited procedural purpose of documenting temporary medical incapacity related to the June 25, 2026 hearing and related procedural filings. Their submission does not waive any transfer or forum objections, any applicable privilege or privacy protection, or any objection to discovery or use of these materials in any merits issue or separate proceeding.

7. Public disclosure of the medical certificate and translation is unnecessary because the Court can evaluate the limited procedural medical-incapacity issue under impoundment.

8. This request is narrowly tailored. Plaintiff seeks to impound only the confidential medical certificate and English translation. Plaintiff does not seek impoundment of the entire case file, the public docket, or this Motion.

9. To safeguard the statutory protections of G.L. c. 214, § 1B against unreasonable, substantial, or serious interference with privacy, Plaintiff requests that Impounded Attachment A and Impounded Attachment B be impounded and withheld from public inspection in accordance with the Court's impoundment order.

10. Plaintiff does not waive any applicable privilege, confidentiality, privacy protection, objection to discovery, or objection to use of these materials in this or any other proceeding.

WHEREFORE, Plaintiff respectfully requests that the Court:

A. Accept for filing under impoundment the official medical certificate (Impounded Attachment A) and English translation (Impounded Attachment B);

B. Order that Impounded Attachment A and Impounded Attachment B be impounded and withheld from public inspection in accordance with the Court's impoundment order; and

C. Grant such other relief as justice requires.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

550 Liberty Street, Unit 905

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(617) 806-6566

June 26, 2026

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF TRANSLATION

I, Sandra Frommer, certify that I am competent in Spanish and English, and that the text submitted separately as Impounded Attachment B is a true and accurate English translation of the original Spanish medical certificate designated as Impounded Attachment A, to the best of my knowledge and ability.

Signed under the pains and penalties of perjury this 26th day of June, 2026.

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2026, I served a copy of the foregoing Plaintiff's Motion to Impound Medical Certificate and English Translation Submitted Pursuant to Paper 18 Notice by electronic mail and/or eFileMA service on counsel of record for Defendants. The impounded attachments have been submitted separately under impoundment in accordance with Plaintiff's Motion to Impound.

Lisa M. Gouveia, Esq. (*Counsel for Defendants*)
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Braintree, MA 02184.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer
Sandra's Frommer