

**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 MOTION TO STAY**

I, Sandra Frommer, declare under the penalties of perjury pursuant to G. L. c. 268, section 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 the action's transfer to the Housing Court, and I continue to maintain the transfer, subject-matter-jurisdiction, record-integrity, and procedural objections asserted in Paper 5 and the related papers.
3. I use the present Housing Court caption, case number, paper numbers, and September 10 event date only to identify matters as they presently appear in the receiving court's records and to request interim relief. I do not accept the transfer, the Housing Court as the proper forum, or the completeness, accuracy, attribution, or procedural effect of the present docket. My request does not state that I abandon or decline to pursue the underlying action or any claim in the proper tribunal.
4. I have filed my First Motion for Reconsideration before this stay motion. That motion asks the Court to reconsider the June 25 nonappearance-based dispositions, clarify Paper 5's status, and decide Papers 5, 7, and 11 on the written submissions.
5. A pretrial conference is presently listed for September 10, 2026 under the Housing Court case number.

6. I am medically unable to appear or participate meaningfully in the September 10, 2026 conference. My medical certificate and Certified English Translation submitted under impoundment document my medical unavailability through the end of September 2026.
7. My inability to participate on September 10 is involuntary. It is not a refusal to attend, a tactical decision, an abandonment of the action, an election to proceed on the merits in Housing Court, or acceptance of Housing Court jurisdiction. It expresses no decision to abandon or decline to pursue the underlying claims.
8. I provide this notice in advance and request that the Court stay the September 10 event and related deadlines while it decides reconsideration and Paper 5, and that no default, dismissal, waiver, adverse inference, or failure-to-prosecute consequence arise from my documented inability to participate.
9. If the Court declines to stay the proceedings, I request only as alternative protective relief that the September 10 event and related deadlines be removed and reset after September 30, 2026. That alternative request is not consent to the transfer or acceptance of the present docket.

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