

**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 CORRECT CLERICAL DOCKET ERRORS, TO CLARIFY
NON-ATTRIBUTION OF FILINGS, AND TO PRESERVE DISTINCT PROCEDURAL
POSTURE**

(With Incorporated Memorandum of Law)

I. INTRODUCTION

Plaintiff Sandra Frommer respectfully moves for an order correcting clerical errors in the electronic docket, clarifying the attribution of filings, and preserving the distinct procedural posture of this action.

Recent docket entries reflect filings submitted by Plaintiff as if they were filed jointly by multiple parties, including adverse parties. These entries do not accurately reflect the filings as submitted and create ambiguity regarding authorship and party alignment.

Plaintiff seeks limited, corrective relief to ensure that the record accurately reflects what occurred and to prevent misinterpretation of the procedural posture of this case.

II. RELEVANT DOCKET ENTRIES

On or about March 23, 2026, the docket reflects entries including:

- “Affidavit of Sandra Frommer in Support of Plaintiff’s Emergency Motion filed by Sandra Frommer”
- “Proposed Exhibit Filed by Sandra Frommer, Erika Merritt, UDR NYL Deals GP LLC, UDR, Inc., Lenox Farms Limited Partnership”

These entries attribute Plaintiff’s filings to multiple parties. Plaintiff filed these documents independently. No joint filing was made, authorized, or intended.

III. NEED FOR CORRECTION AND CLARIFICATION

Accurate docket entries are essential to reflect the procedural reality of the case.

The current entries:

- create ambiguity as to which party submitted the filings;
- suggest joint or coordinated filings where none exist;
- risk mischaracterizing the positions of the parties; and
- may affect how this case is understood in any related or reviewing proceeding.

Plaintiff does not seek to alter any ruling or substantive determination. The requested relief is limited to correcting the record and clarifying attribution.

IV. EXPRESS NON-ATTRIBUTION OF FILINGS

Plaintiff expressly states:

- The referenced filings were made **solely by Plaintiff**;
- Plaintiff does **not join, adopt, or incorporate** any filings by any other party;
- Plaintiff has not authorized any joint filing with any Defendant; and
- Any docket entry suggesting otherwise is inaccurate.

V. PRESERVATION OF PROCEDURAL POSTURE

Plaintiff further seeks clarification that correction of the docket:

- does not merge this action with any other matter;
- does not constitute consolidation with any other case;
- does not reflect any agreement, coordination, or alignment with any other

party; and

- does not waive or alter any jurisdictional, procedural, or appellate rights.

This clarification is necessary to ensure that the record accurately reflects the independent posture of this action.

VI. LEGAL BASIS FOR RELIEF

A. Correction of Clerical Errors (Mass. R. Civ. P. 60(a))

Under **Mass. R. Civ. P. 60(a)**, clerical mistakes in “judgments, orders or other parts of the record” arising from oversight or omission may be corrected at any time.

Docket entries are part of the record. Rule 60(a) permits correction where the record does not accurately reflect what occurred.

Courts recognize that Rule 60(a) is intended to ensure that the record reflects reality. See, e.g.,

- First National Bank v. National Airlines (chatgpt://generic-entity?number=0);
- Ferraro v. Arthur M. Rosenberg Co., Inc. (chatgpt://generic-entity?number=1).

Here, the misattribution of Plaintiff’s filings to multiple parties constitutes an error arising from oversight or omission within the meaning of Rule 60(a).

B. Limited and Non-Substantive Nature of Relief

The requested correction:

- does not alter any substantive ruling;
- does not affect any party's rights;
- serves only to ensure accuracy of the record.

Accordingly, it falls squarely within Rule 60(a).

C. Alternative Basis for Relief

To the extent the Court determines that the issue exceeds a purely clerical correction, relief is alternatively appropriate under **Mass. R. Civ. P. 60(b)** to address mistake or to ensure that the record is not maintained in a manner inconsistent with fair process.

VII. RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

1. **Correct the docket entries** to reflect that the referenced filings were made solely by Plaintiff;
2. **Clarify that the filings are not joint filings** and are not attributable to any Defendant;
3. **Order that correction of the record does not alter the procedural posture** of this action, including:
 - no consolidation;
 - no merger with any other matter;
 - no implied consent to jurisdiction;
 - no waiver of rights;
4. Grant such further relief as the Court deems just and appropriate to ensure the accuracy and integrity of the record.

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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March 26, 2026

/s/ Sandra Frommer
Sandra's Frommer

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 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,

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/s/ Sandra Frommer
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