

EXHIBIT 13

Timeline of Events – 26 Sanderson Avenue

Date	Event	Evidence	Legal Significance
09/24– 09/30/2025	Initial contact, agreement to rent, permission to send mail	Text messages (Exhibit D)	Establishes tenancy formation
10/01/2025	Landlord agrees to provide key	Text messages (Exhibit D)	Control/possession of unit
10/15/2025	Tenant retrieves key; begins occupancy	Text messages (Exhibit D)	Start of tenancy
10/31/2025	First roof leak (water dripping onto bed)	Text messages (Exhibit D, pg. 8-9, #69-75, Exhibit F, #1-3)	Breach of warranty of habitability begins
10/31/2025	Landlord acknowledges issue, promises repair	Text messages (Exhibit D, pg. 9, #76-78)	Notice + failure to cure
11/02/2025	Tenant requests repair status before rain	Text messages (Exhibit D, pg. 11, #103)	Ongoing notice
11/10/2025	Bathroom still unusable	Text messages (Exhibit D, pg. 12, #108)	Loss of promised amenity
11/16/2025	Second leak (again onto bed)	Text messages (Exhibit D, pg. 12, #109-111, Exhibit F, #4)	Repeated habitability violation
11/16/2025	Request for bathroom update, no response	Text messages (Exhibit D, pg. 12, #112)	Continued failure to cure
11/26/2025	Formal written repair request sent, complaint filed with Lynn BOH	Repair letter, BOH (Exhibit C, E)	Formal notice under MA law
11/26/2025 11/28/2025	Landlord claims roof scheduled, bathroom “started”	Text messages (Exhibit D, pg. 15, #114-119, Exhibit F, #9)	Partial acknowledgment, delay
12/01/2025	Landlord claims roof replaced and bathroom work to start ‘this weekend’	Text messages (Exhibit D, pg. 15, #121)	Unfulfilled repair promise
12/02/2025	Third documented water intrusion damaging bed	Text messages (Exhibit D, pg. 16, #126-128, Exhibit F, #5)	Property damage + ongoing breach

Date	Event	Evidence	Legal Significance
12/12/2025	BOH initial inspection, confirmed roof leak, order repair	BOH (Exhibit E)	Official confirmation of violation
12/09/2025 12/19/2025	Repeated requests for updates; no resolution	Text messages (Exhibit D, pg. 16-17, #129-135, Exhibit F, #6)	Pattern of non-response
12/19/2025	Tenant proposes contractors for emergency repair	Text messages (Exhibit D, pg. 17-18, #136, #138 #140-142)	Reasonable mitigation effort
12/19/2025	Landlord delays, claims issue unclear, then claims suggested contractors will 'check it out'	Text messages (Exhibit D, pg. 18, #137, #143, #145)	Failure to act reasonably
12/19/2025	Tenant, another request for bathroom status, no reply	Text messages (Exhibit D, pg. 18, #139)	Continued non-response
12/21/2025 01/06/2026	Continued lack of repair; rent still paid	Text messages (Exhibit D, pg. 19, #149-152)	Tenant performance despite breach
01/07/2026	Chapter 93A demand sent	93A letter (Exhibit H, I)	Triggers statutory liability
01/09/2026	BOH full building inspection, inspector confirms illegal boarding house	BOH (Exhibit E, pg. 1)	Independent code violation evidence
01/18/2026	Landlord suggests tenant leave	Text messages (Exhibit D, pg. 23, #187)	Constructive eviction evidence
01/18/2026	Landlord claims repairs done (not true)	Text messages (Exhibit D, pg. 23, #189-190)	Misrepresentation
01/20/2026	Tenant documents no repair completed	Text messages (Exhibit D, pg. 24, #195-197, Exhibit F, #7-8)	Proof of false statements
01/23/2026	Tenant sends termination notice	Notice (Exhibit J)	Lawful termination
01/23/2026	Tenant requests return of prepaid February rent	Email (Exhibit K)	Damages claim
01/27/2026	Move-out confirmation sent	Move-out letter (Exhibit L)	End of tenancy
02/03/2026	Keys returned	Text messages (Exhibit D, pg. 25, #202)	Final surrender of premises