

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LEONA FAREN,

Plaintiff,

v.

ZENIMAX ONLINE STUDIOS, LLC AND
AP BENEFIT ADVISORS, LLC

Defendant.

Case No. 1:23-cv-01270

**DEFENDANT AP BENEFIT ADVISORS, LLC'S MOTION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S AMENDED COMPLAINT**

Defendant AP Benefit Advisors, LLC ("Defendant AP"), by and through its undersigned counsel, respectfully submits this Motion to Extend Time to Respond to Plaintiff's Amended Complaint. In support of this request, Defendant AP states as follows:

1. On August 4, 2023, Plaintiff filed an Amended Complaint for Equitable and Monetary Relief and Demand for Jury Trial.

2. As of July 24, 2023, Counsel for Defendant AP and Counsel for Plaintiff have communicating resolving this matter without the Court's intervention because Defendant AP is not a properly named party to the lawsuit.

3. Defendant AP requests a twenty-one (21) day extension from August 18, 2023 to September 11, 2023 respond to Plaintiff's Amended Complaint.

4. Defendant proposes to amend the briefing schedule as follows:

Event	Current Deadlines	Updated Deadlines
Deadline for Defendant to respond to Plaintiff's Amended Complaint.	8/18/2023	9/11/2023

5. Counsel for Plaintiff agreed to the requested extension of time to respond to Plaintiff's Amended Complaint.

For the foregoing reasons, Defendant AP respectfully requests that the Court grant its Motion to Extend Time to Respond to Plaintiff's Amended Complaint.

Dated: August 17, 2023

Respectfully submitted,

/s/ Patrick T. Wilson

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Counsel for Defendant AP Benefit Advisors, LLC

CERTIFICATE OF SERVICE

I HEREBY certify that a true copy of the foregoing was electronically filed and served via the Court's ECF filing system on this 17th day of August 2023, with copies by email to:

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