

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 CONSENT MOTION TO EXTEND  
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

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

1. On May 14, 2023, Plaintiff filed a Complaint for Equitable and Monetary Relief and Demand for Jury Trial *See* ECF 1.
2. On July 6, 2023, Defendant AP requested and was granted an extension to file its response through July 28, 2023, to facilitate further discussion with Plaintiff. *See* ECF 15 & 18.
3. 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.
4. On July 24, 2023, Counsel for Defendant AP and Counsel for Plaintiff most recently conferred to discuss providing Plaintiff's counsel with information that would establish the grounds for voluntarily dismissing Defendant AP from this action.

5. Defendant AP requested a second extension of twenty-one (21) days from July 28, 2023 to respond to Plaintiff's Complaint.

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

7. Defendant proposes and Plaintiff has consented to amend the briefing schedule as follows:

<b>Event</b>	<b>Current Deadlines</b>	<b>Updated Deadlines</b>
Deadline for Defendant to respond to Plaintiff's Complaint.	<b>7/28/2023</b>	<b>8/18/2023</b>

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

Dated: July 26, 2023

Respectfully submitted,

/s/ Patrick T. Wilson

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*Counsel for Defendant.*

**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 26th day of July 2023, with copies by email to:

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