

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

COME NOW Defendant AP Benefit Advisors, LLC, by and through undersigned counsel, respectfully submits this Motion to Extend Time to Respond to Plaintiff's Complaint. In support, Defendant states as follows:

1. On May 14, 2023, Plaintiff filed a Complaint for Equitable and Monetary Relief and Demand for Jury Trial.
2. Counsel for Defendant has been only recently retained and is still reviewing the matter and preparing a response to the Complaint.
3. As of July 6, 2023, Defendant has communicated with Plaintiff about resolving this matter separately without the Court's intervention.
4. To facilitated this process and provide time for a response, Defendant requests a twenty-one (21) day extension from July 7, 2023 to answer or otherwise respond to Plaintiff's Complaint, through **July 28, 2023**.

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

| Event | Current Deadlines | Updated Deadlines |
|---|-------------------|-------------------|
| Deadline for Defendant to respond to Plaintiff's Complaint. | 7/7/2023 | 7/28/2023 |

6. On July 5, 2023, counsel for Defendant communicated the request for an extension to respond to Plaintiff's Complaint to Plaintiff's counsel, but did not receive an answer before the filing of this motion

7. Counsel for the Defendant makes this request for the extension to respond to Plaintiff's Complaint in good faith and does not intend to create any undue delay.

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

Dated: July 6, 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 6th day of July 2023, with copies by email to:

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