

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 1:21-cv-23472-RNS

Ryan Birmingham, Roman Leonov, Steven Hansen,
Mitchell Parent, and Jonathan Zarley, individually
and on behalf of all others similarly situated,

Plaintiffs,

v.

Alex Doe, *et al.*,

Defendants.

**PLAINTIFFS’ *UNOPPOSED* MOTION FOR AN EXTENSION OF TIME TO RESPOND
TO DEFENDANT ALLA SKALA’S MOTION TO DISMISS THE AMENDED
COMPLAINT**

Ryan Birmingham, Roman Leonov, Steven Hansen, Mitchell Parent, and Jonathan Zarley, and others similarly situated (collectively “Plaintiffs”), by and through undersigned counsel, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, hereby file their *Unopposed* Motion for Extension of Time to Respond to Defendant Alla Skala’s Motion to Dismiss [ECF No. 181]. Plaintiffs request thirty (30) days, whereby Plaintiffs would have until August 13, 2022 to respond. In support of this Motion, Plaintiffs state:

1. The Clerk entered default against Alla Skala (“Skala”) on May 31, 2022 for failure to appear, answer, or otherwise plead to the complaint. ECF No. 154.

2. On June 27, 2022, Skala’s attorney made an appearance and moved the Court to set aside the Clerk’s Default. ECF Nos. 175–76. Thereafter, the Court granted the motion. ECF No. 183.

3. On June 30, 2022, Skala filed her Motion to Dismiss Plaintiffs’ Amended Complaint. ECF No. 181. Accordingly, Plaintiffs’ response is currently due on July 14, 2022.

4. Plaintiffs respectfully request a thirty (30) day extension of time to respond to Skala’s Motion to Dismiss, up through and including August 13, 2022.

5. Enlargements of time are permitted with good cause by Federal Rule of Civil Procedure 6(b). Such enlargements of time should be liberally granted absent a showing of bad faith or undue prejudice. *See, e.g., Lizarazo v. Miami-Dade Corrections & Rehab. Dept.*, 878 F.3d 1008, 1012 (11th Cir. 2017) (citing *U.S. v. Miller Bros. Constr. Co.*, 505 F.2d 1031, 1035 (10th Cir. 1974)).

6. The extension of time is necessary as Plaintiffs are still in the process of reviewing and investigating the arguments asserted in Skala's Motion to Dismiss. Counsel also requests this extension due to the undersigned's case load, which includes matters pending in both federal and state court. In this case alone, Counsel is managing three concurrent Motions to Dismiss.

7. Based on the foregoing, pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiffs have demonstrated good cause to extend the time to respond to Skala's Motion to Dismiss. Moreover, no party will be prejudiced by the relief requested in this Motion, and the Motion is not filed for the purposes of delay.

8. Plaintiffs' counsel conferred with Skala's attorneys with respect to the relief sought in this Motion. Skala's attorneys agreed to the extension, up to and including August 13, 2022.

9. A proposed Order granting the instant unopposed Motion is attached hereto.

WHEREFORE, Plaintiffs respectfully request the Court to enter an Order granting the extension of time for Plaintiffs to respond to Skala's Motion to Dismiss, up to and including August 13, 2022.

CERTIFICATION UNDER LOCAL RULE 7.1(A)(3)

Pursuant to Local Rule 7.1(a)(3), I hereby certify that Andrew Balthazor, counsel for Plaintiffs, conferred with Skala's attorneys regarding the relief requested herein. They do not

oppose the requested extension of time, until August 13, 2022, to Respond to Skala's Motion to Dismiss.

Dated: July 7, 2022.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on or about July 7, 2022, a true and accurate copy of Plaintiffs' Motion for Extension of Time was served on counsel of record via the CM/ECF system. For parties that do not receive Notices of Electronic Filing, the undersigned further certifies that a copy of the foregoing documents was served upon Defendants at the addresses listed below via mail or as otherwise indicated:

Art Sea Group Ltd. Via publication on Plaintiffs' website	Auro Advantages, LLC Via publication on Plaintiffs' website
Easy Com, LLC c/o Registered Agent 159 Main Street, Unit 100, Nashua, NH 03060	Marina Garda Via publication on Plaintiffs' website
Global E-Advantages LLC c/o Registered Agent North West Registered Agent LLC 8 The Green, Suite B, Dover, DE 19901	Grovec, LLC c/o Registered Agent Delaware Business Incorporators 3422 Old Capitol Trail, Suite 700 Wilmington, DE 19808
Ivan Hrechaniuk Via direct message to his LinkedIn profile	Borys Konovalenko Via email to borys.konovalenko@gmail.com
Mayon Solutions Ltd Via email to info@mayon.solutions and sales@mayon.solutions	Mayon Solutions, LLC (1) c/o Registered Agents, Inc. 159 Main Street, Unit 100, Nashua, NH 03060; and (2) Via courtesy email to Mayon.llc@gmail.com
Notus, LLC c/o Registered Agent Colorado Registered Agent LLC 1942 Broadway Street, Suite 314C, Boulder, CO 80302	Profit Media Group LP 4 Queen Street, Suite 1, Edinburgh, GB, EH21JE
Shopostar, LLC c/o Registered Agent Colorado Registered Agent LLC 1942 Broadway Street, Suite 314C, Boulder, CO 80302	Olga Tielly 3rd Floor 207 Regent Street, London, United Kingdom W1B3HH
Trans-Konsalt MR Ltd. Via publication on Plaintiffs' website.	

Respectfully submitted,

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