

**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.

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**PLAINTIFFS' *UNOPPOSED* MOTION FOR AN EXTENSION OF TIME TO RESPOND  
TO DEFENDANTS BOONRUK RUAMKIT CO. LTD., IT OUTSOURCING CO. LTD,  
NATTPEMOL KRINARA, AND PAPAHRATSORN RAVIRATPORN'S MOTION TO  
DISMISS IN FURTHERANCE OF SETTLEMENT DISCUSSIONS**

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 Boonruk Ruamkit Co. Ltd., It Outsourcing Co. Ltd, Nattpemol Krinara, and Papahratsorn Raviratporn (collectively the "Thai Defendants") Motion to Dismiss [ECF No. 169]. Plaintiffs request thirty (30) days, whereby Plaintiffs would have until August 27, 2022 to Respond. In support of this Motion, Plaintiffs state:

1. The Thai Defendants filed their Motion to Dismiss on June 16, 2022. Plaintiffs filed an Unopposed Motion for Extension of Time to file a Response (ECF No. 174), which the Court granted on June 27, 2022 (ECF No. 179). The Plaintiffs filed a second Unopposed Motion for Extension of Time (ECF No. 191), which the Court partially granted (ECF No. 192). Accordingly, Plaintiffs' response is currently due on July 28, 2022.

2. Plaintiffs are appreciative of the Court's generous extensions of time and note its understandable reluctance to grant further extensions to Respond (ECF No. 193). However,

Plaintiffs wish to inform the Court that each of these extensions, and the one herein, have been made in furtherance of ongoing settlement discussions with the Thai Defendants. Based on requests from the Thai Defendants' counsel, Plaintiffs have respectfully kept these discussions confidential. Nevertheless, the Thai Defendants have agreed that we may now reveal this fact to the Court in furtherance of this extension.

3. As a result, Plaintiffs respectfully request a thirty (30) day extension of time to respond to the Thai Defendants' Motion to Dismiss, up through and including August 27, 2022.

4. 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)).

5. The extension of time is necessary to further settlement discussions between the parties and prevent unnecessary filings—wasting both party and Court resources.

6. 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 the Thai Defendants' 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.

7. On July 27, 2022 Plaintiffs conferred with the Thai Defendants' counsel regarding the relief sought in this Motion, and agreed to the extension for Plaintiffs to file a Response to their Motion to Dismiss, up to and including August 27, 2022.

8. 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 the Thai Defendants' Motion to Dismiss, up to and including August 27, 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 Benjamin Reiss (counsel for the Thai Defendants) regarding the relief requested herein. Benjamin Reiss does not oppose the requested extension of time, until August 27, 2022, to Respond to the Thai Defendants' Motion to Dismiss.

Dated: July 27, 2022.

Respectfully submitted,

/s/ Dennis A. González

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on or about July 27, 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:

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

Respectfully submitted,

/s/ Dennis A. González

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