

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA (MIAMI)
CASE NO.: 1:19-cv-25045-JEM

VICKY CORNELL, individually,
and in her capacity, and as the
Personal Representative of the
Estate of Christopher John Cornell
also known as Chris Cornell,

Plaintiff,

vs.

SOUNDGARDEN, a purported
Washington General Partnership,
KIM A. THAYIL, MATT D. CAMERON,
HUNTER BENEDIT SHEPHERD,
RIT VENERUS and CAL FINANCIAL
GROUP, INC.

Defendant(s)

**DEFENDANTS UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants, RIT VENERUS (“Venerus”) and CAL FINANCIAL GROUP, INC. (“Cal Financial”) (“Defendants”), by and through their undersigned counsel, hereby file their Unopposed Motion for Extension of Time to Respond to Plaintiff’s Complaint, pursuant to Federal Rules of Civil Procedure 6(b), and in support thereof state as follows:

1. On or about December 09, 2019, Plaintiff filed its Complaint in this action [D.E. 1].
2. Defendants Venerus and Cal Financial previously filed a Motion for Extension of Time that was granted. Defendants’ response to the complaint is currently due on January 15, 2020.
3. Previously, Plaintiff agreed that all defendants had an extension until February 3, 2020 to respond to the complaint. The defendants in this matter, other than Venerus and Cal Financial,

filed Motions for Extensions until February 3, 2020 that were granted. Venerus and Cal Financial also want to utilize the February 3, 2020 deadline for consistency.

4. Moreover, Defendants Venerus and Cal Financial are exploring a possible resolution of this matter. Accordingly, the additional time to respond is in the interest of judicial efficiency.

WHEREFORE, Defendants respectfully requests that this Court enters an Order granting an extension of time, up through and including February 3, 2020, to respond to Plaintiff's Complaint.

CERTIFICATE OF GOOD FAITH

Pursuant to Local Rule 7.1(a)(3), undersigned counsel for the Defendants certifies that they have in good faith conferred by phone and email with counsel for Plaintiff regarding the requested extension, and counsel for Plaintiff does not oppose the relief requested in the motion.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of January 2020 , a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notice of electronic filing to all parties on the Service List below or in some other authorized manner for those counsel or parties who are not authorized to receive notices electronically.

Respectfully submitted,

KAUFMAN DOLOWICH & VOLUCK, LLP

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SERVICE LIST

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