

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SUREFUNDING, LLC
a Delaware limited liability company,

Plaintiff,

v.

GOODWIN PROCTER LLP,
A Massachusetts limited liability partnership

Defendant.

CIV. A. NO. 22–10478

**JOINT MOTION TO EXTEND DEADLINE FOR
DEFENDANT TO ANSWER OR OTHERWISE RESPOND TO COMPLAINT**

Plaintiff SureFunding, LLC (“Plaintiff”) and Defendant Goodwin Procter LLP (“Defendant”) move pursuant to Fed. R. Civ. P. 6(b) to extend the deadline for Defendant to answer or otherwise respond to the Complaint. In support of this Motion, the parties state as follows:

1. The Complaint was filed on March 30, 2022. On April 27, 2022, Plaintiff’s counsel, Ilyas J. Rona of Milligan Rona Duran & King LLC, served Defendant’s counsel, Richard M. Zielinski of Goulston & Storrs PC, with the Complaint by e-mail. In his e-mail, Mr. Rona included a Waiver of Service form, which Mr. Zielinski signed and return the same day.

2. Pursuant to Defendant’s waiver of service, Goodwin must answer or otherwise respond to the Complaint by June 27, 2022.

3. The parties are currently engaged in discussions that may make it unnecessary for Defendant to respond substantively to the Complaint. Two additional weeks should give the parties an opportunity to consummate those discussions.

4. On June 27, 2022, counsel for Plaintiff and counsel for Defendant met and conferred as to this Motion. The parties agreed to jointly file this Motion.

For the above-stated reasons, the parties respectfully request that the Court grant this Joint Motion to Extend the Deadline for Defendant to Answer or Otherwise Respond to the Complaint by two weeks (until July 11, 2022).

/s/ Richard Zielinski

Richard Zielinski (Bar No. 540060)

Joel E. Antwi (Bar No. 699562)

Abigail E. Fletes (Bar No. 707177)

GOULSTON & STORRS PC

400 Atlantic Avenue

Boston, Massachusetts 02110

(617) 482-1776

rzielinski@goulstonstorrs.com

jantwi@goulstonstorrs.com

afletes@goulstonstorrs.com

Counsel for Goodwin Procter LLP

/s/ Michael J. Duran

Michael J. Duran (BBO# 569234)

Ilyas J. Rona, Esq. (BBO# 642964)

MILLIGAN RONA DURAN & KING LLC

50 Congress Street, Suite 600

Boston, Massachusetts 02109

(617) 395-9570

ijr@mrdklaw.com

mjd@mrdklaw.com

Counsel for SureFunding, LLC

CERTIFICATE OF SERVICE

I certify that on the 27th of June 2022 I caused a copy of the foregoing Joint Motion to be served via the court's electronic filing system to the following counsel of record:

Michael J. Duran, Esq.
Ilyas J. Rona, Esq.
MILLIGAN RONA DURAN & KING LLC
50 Congress Street, Suite 600
Boston, Massachusetts 02109
(617) 395-9570
ijr@mrklaw.com
mjd@mrklaw.com
Counsel for SureFunding, LLC

I certify under penalty of perjury that the foregoing is true and correct.

s/ Abigail E. Fletes
Abigail E. Fletes

Executed on June 27, 2022