IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

BERINGER COMMERCE, INC., d/b/a BLUE ACORN, iCi., Plaintiff, vs. FIN CAP, INC., d/b/a "BLUEACORN.CO," BLUE ACORN PPP, LLC, BLUE OAK FOREST, LLC, MICHAEL S. COTA, JAMES FLORES, STEPHANIE HOCKRIDGE REIS, and NATHAN REIS, Defendants.	Civil Action No. 5:21-cv-251-BO

CONSENT MOTION FOR EXTENSION OF TIME

Defendants Fin Cap, Inc., Blueacorn PPP, LLC and Blue Oak Forest, LLC (collectively, the "Blueacorn PPP Defendants"), through undersigned counsel, and pursuant to Rule 12 of the Federal Rules of Civil Procedure and EDNC Local Rule 6.1, hereby move for an extension of time to respond to the Verified Complaint. (Dkt. 1).

1. Service of process was made upon the Blueacorn PPP Defendants as follows: (a) Defendant Fin Cap, Inc. was served on June 15, 2021; (b) Defendant Blue Oak Forest, LLC was served on June 17, 2021; and (c) Defendant Blueacorn PPP, LLC was served on June 29, 2021.

2. The Blueacorn PPP Defendants move for an extension of time to and including July 20, 2021 for answering or otherwise responding to the Verified Complaint, which will promote judicial efficiency by allowing all three of the Blueacorn PPP Defendants to answer or respond to the Verified Complaint at the same time.

3. Undersigned counsel has consulted with counsel for Plaintiff, who has consented to the requested extension of time.

WHEREFORE, for the foregoing reasons, the Blueacorn PPP Defendants' Motion for Extension of Time should be granted, and the Blueacorn PPP Defendants should be allowed to answer or otherwise respond to the Verified Complaint on or before July 20, 2021.

This the 2nd day of July, 2021.

NELSON MULLINS RILEY & SCARBOROUGH LLP

/s/ *Christopher J. Blake*
Christopher J. Blake
N.C. State Bar No. 16933
chris.blake@nelsonmullins.com
D. Martin Warf
N.C. State Bar No. 32982
martin.warf@nelsonmullins.com
4140 Parklake Avenue, Suite 200
Raleigh, North Carolina 27612
Phone: (919) 329-3800
Fax: (919) 329-3799

Counsel for Defendants Fin Cap, Inc., Blueacorn PPP, LLC and Blue Oak Forest, LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

NELSON MULLINS RILEY & SCARBOROUGH LLP

/s/ *Christopher J. Blake*
Christopher J. Blake
N.C. State Bar No. 16933
chris.blake@nelsonmullins.com
4140 Parklake Avenue, Suite 200
Raleigh, North Carolina 27612