

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
CIVIL ACTION NO. 5:21-CV-251-BO

BERINGER COMMERCE, INC. d/b/a	)	
BLUE ACORN iCi,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	MOTION FOR EXTENSION OF TIME
FIN CAP, INC. d/b/a "BLUEACORN.CO,"	)	TO ANSWER OR OTHERWISE
BLUE ACORN PPP, LLC, BLUE OAK	)	RESPOND TO PLAINTIFF'S
FOREST, LLC, MICHAEL S. COTA,	)	COMPLAINT
JAMES FLORES, STEPHANIE	)	
HOCKRIDGE REIS, and NATHAN REIS,	)	(WITH CONSENT)
	)	
Defendants.	)	

Defendants James Flores, Stephanie Hockridge Reis, and Nathan Reis ("Defendants"), by and through undersigned counsel, move this Court, pursuant to Federal Rule of Civil Procedure 6(b), for an extension of time up to and including July 30, 2021, within which to answer or otherwise plead in response to the Complaint. In support of the motion, Defendants show the Court as follows:

1. Plaintiffs have filed affidavits of service of the summons and complaint reflecting delivery by Federal Express to certain persons on June 16, 2021.
2. Undersigned counsel was contacted regarding this matter on July 19, 2021.
3. Rather than contest service, undersigned counsel contacted counsel for Plaintiff and requested an agreed extension of time to respond to the Complaint.

4. Counsel for Plaintiff has consented to an extension of time up through and including July 30, 2021.

5. No prior extension has been granted by the Court to these Defendants.

WHEREFORE, Defendants James Flores, Stephanie Hockridge Reis, and Nathan Reis request that this Court enter an order extending the time within which they must answer or otherwise respond to the Complaint up through and including July 30, 2021.

This the 20th day of July, 2021.

GRAEBE HANNA & SULLIVAN, PLLC

/s/ Christopher T. Graebe

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*Counsel for James Flores, Stephanie Hockridge Reis,
and Nathan Reis*

CERTIFICATE OF SERVICE

I hereby certify that on July 20, 2021, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

This the 20th day of July, 2021.

/s/ Christopher T. Graebe

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