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, v. FIN CAP, INC. d/b/a "BLUEACORN.CO," BLUE ACORN PPP, LLC, and BLUE OAK FOREST, LLC, Defendants.	**AMENDED MOTION FOR EXTENSION OF TIME**

NOW COMES Plaintiff BERINGER COMMERCE, INC. d/b/a BLUE ACORN iCi, ("Blue Acorn iCi") by and through the undersigned counsel, pursuant to Rule 6(b) of the Federal rules of Civil Procedure and Local Rule 7.1(a), for good cause shown, and respectfully moves for an extension of time to serve a response to Defendants FIN CAP, INC. d/b/a "BLUEACORN.CO," BLUE ACORN PPP, LLC, and BLUE OAK FOREST, LLC, ("Defendants") First Set of Interrogatories and First Requests of Production of Documents ("Discovery Requests"). In support of this Motion, Plaintiff states as follows:

1. On June 10, 2021 Plaintiff filed its Complaint in the Eastern District of North Carolina [DE-1].

2. On November 16, 2021 Defendants served Plaintiff with their Discovery Requests.

3. The file for serving a response to Defendants' Discovery Requests has not yet expired.

4. This Motion is made in good faith and not for the purpose of delay or any other improper purpose.

5. Plaintiff requests additional time to respond to Defendants' Discovery Requests through and including January 10, 2022.

6. Pursuant to Local Rule 6.1(a), the undersigned certifies that she has consulted with the counsel for Defendants, who consents to the extension of time.

7. A proposed order is submitted contemporaneously with the filing of this Motion.

RESPECTFULLY SUBMITTED this the 6th day of December, 2021.

/s/ Beth A. Stanfield
Beth A. Stanfield (N.C. State Bar No. 36296)
Laura K. Greene (N.C. State Bar No. 47771)
FORREST FIRM, P.C.
105 Grace Street, Suite 101
Wilmington, NC 28401
T/F: (336) 275 - 6344
Beth.stanfield@forrestfirm.com
katie.greene@forrestfirm.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the foregoing **AMENDED MOTION FOR EXTENSION OF TIME** has been filed with the Clerk for the United States District Court, Eastern District of North Carolina, using the electronic filing system of the Court. The electronic case filing system will send a "Notice of Electronic Filing" to all attorneys of record who have consented to accept service by electronic means.

This the 6th day of December, 2021.

/s/ Beth A. Stanfield
Beth A Stanfield
Laura K. Greene

Attorneys for Plaintiff