**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

OTO ANALYTICS, LLC, Plaintiff, v. **BENWORTH CAPITAL PARTNERS PR, LLC; BENWORTH CAPITAL PARTNERS, LLC; BERNARDO NAVARRO and CLAUDIA NAVARRO,** Defendants.	Civil No. 23-01034 (GMM)
FEDERAL RESERVE BANK OF SAN FRANCISCO, Plaintiff-Intervenor, v. **OTO ANALYTICS, LLC; BENWORTH CAPITAL PARTNERS PR, LLC; BENWORTH CAPITAL PARTNERS, LLC; BERNARDO NAVARRO and CLAUDIA NAVARRO,** Defendants in Intervention.	

**JOINT MOTION FOR EXTENSION OF TIME TO
ANSWER PLAINTIFF'S DISCOVERY REQUESTS**

TO THE HONORABLE COURT:

COME NOW defendants Benworth Capital Partners PR, LLC ("Benworth PR"), Benworth Capital Partners, LLC ("Benworth FL"), and Bernardo and Claudia Navarro ("Mr. and Mrs. Navarro," jointly with Benworth PR and Benworth FL, the "Defendants"), through the undersigned counsel, and respectfully state and pray as follows:

1. On July 19, 2024, plaintiff Oto Analytics, LLC ("Plaintiff") notified each of the

Defendants with a *First Set of Interrogatories* and a *Request for Production of Documents* ("Discovery Requests"), to be answered within thirty (30) days, or by today, August 19, 2024.

2. To date, the Defendants have been working in identifying any relevant and responsive information and/or documents, as well as working on the answers and objections to the discovery requests while simultaneously preparing their respective answers to the Amended Complaint, which were also due today, August 19th. However, despite the best efforts to complete this process by today's deadline, additional time is needed to finalize the investigation and draft the answers and objections to the Discovery Requests and secure approval to execute the same.

3. To that end, on August 16, 2024, the Defendants reached out to Plaintiff requesting a good-faith extension of time of thirty (30) additional days, or until September 18th, to submit their answers to the Discovery Requests. However, today, August 19th, the Plaintiff rejected the extension requested by Defendants *before* the deadline and, instead, offered a mere two-day extension to respond to the documents requests and one week to answer the interrogatories on the condition that the Defendants agree to answer the interrogatories and waive any objections to them. Plaintiff's proposition is simply unreasonable and not feasible for the Defendants.

4. The Defendants very respectfully inform this Honorable Court that the 30-day extension that was requested in good faith to Plaintiff is *indispensable* to complete their efforts in compiling the relevant and responsive information and documents and developing the responses and objections to the Discovery Requests, and therefore respectfully request that the Court allow such 30-day extension of time, until September 18, 2024, to do so.

5. The extension requested herein is sought in good faith, within the original deadline to respond, and will not cause undue delay in the instant proceedings or cause any prejudice, considering that the responses to the Discovery Requests would be submitted a month before the

deadline for substantial completion of document discovery under the Proposed Scheduling Order (D.E. 122). Moreover, Plaintiff-Intervenor just filed a request to consolidate this case with the case styled *Federal Reserve Bank of San Francisco v. Benworth Capital Partners LLC, et al*., Civil No. 24-01313 (GMM), to which Plaintiff has already expressed its consent and the Defendants have indicated they will not oppose. If that motion is granted, it is likely to require new proposed case management deadlines, including the extension of the discovery deadline.

WHEREFORE, the Defendants respectfully request that this Honorable Court grant the instant joint motion and, consequently, allow a 30-day extension of time, until September 18, 2024, for the Defendants to notify their answers to Plaintiff's Discovery Requests.

CERTIFICATE OF SERVICE: We hereby certify that on this same date the foregoing motion was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys and participants of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on this 19th day of August 19, 2024.

[SIGNATURE PAGE FOLLOWS]

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