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

FEDERAL RESERVE BANK OF SAN FRANCISCO, Plaintiff v. **OTO ANALYTICS, LLC; BENWORTH CAPITAL PARTNERS PR, LLC; BENWORTH CAPITAL PARTNERS, LLC; BERNARDO NAVARRO and CLAUDIA NAVARRO,** Defendants.	Civil No. 23-01034 (GMM) *cons.* Civil No. 24-01313 (GMM)

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO COMPLY WITH THE COURT'S DISCOVERY ORDER [D.E. 223]

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" and, jointly with Benworth PR and Benworth FL, the "Defendants"), through the undersigned counsel and pursuant to Local Rule 16(h)(i)(1), respectfully request that the Court extend the deadline for Defendants to comply with the Court's Order on Plaintiff's *Motion to Compel (1) Responses to Interrogatory Nos. 1, 2 and 4 to the Navarros; (2) Documents Responsive to Document Requests Nos. 6,7,11,and 12 to the Navarros; and (3) Documents Responsive to Document Request No. 18 to Benworth FL and Benworth PR* (the "Order") (D.E. 223).

1. On March 24, 2025, the Court entered the Order, ordering Defendants to produce documents responsive to certain requests for production concerning the "Navarro Entities" on or before April 11, 2025. (*See* D.E. 223).

2. Up until April 8, 2025, Defendants' counsel was under the impression that the total volume of documents subject to review and production pursuant to the Order was approximately 3,500 documents and review of those documents was underway. However, after discovering that a key search term ("Benfam") had been inadvertently applied to the incorrect search set, counsel reapplied the term to the proper set, which revealed over 20,000 documents with hits, including more than 10,000 unique documents, vastly expanding the scope of required review and production.

3. Due to this unexpected expansion in volume, Defendants respectfully request a brief extension, through April 21, 2025, to fully comply with the Court's Order.

4. On April 11, 2025, Defendants reached out to counsel for the Federal Reserve Bank to explain the situation. Said counsel confirmed via email that Plaintiff does not oppose the requested extension, provided Defendants begin production on a rolling basis by April 15, 2025, and complete their production by April 21, 2025. Defendants are agreeable to those terms and intend to begin production accordingly.

5. This motion is made in good faith to ensure compliance with the Court's Order based on the newly discovered volume of material, and not for purposes of delay. Granting this motion will not prejudice the Plaintiff, who has expressed no objection to the requested extension under the terms outlined in Paragraph 4 of this motion.

WHEREFORE, Defendants respectfully request that the Court grant this unopposed motion and extend the deadline to comply with the Court's Order at D.E. 223 to April 21, 2025, with rolling production beginning by April 15, 2025.

CERTIFICATE OF SERVICE: We hereby certify that on this same date the foregoing reply 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 April 11, 2025.

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