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

OTO ANALYTICS, LLC, Plaintiff, vs. BENWORTH CAPITAL PARTNERS PR LLC, BENWORTH CAPITAL PARTNERS LLC, BERNARDO NAVARRO and CLAUDIA NAVARRO, Defendants.	Civil No. 23-1034 (GMM)

JOINT MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF MOTIONS TO DISMISS AND REQUESTING AN EXTENSION OF TIME TO FILE THE JOINT REPLY BRIEF

TO THE HONORABLE COURT:

COME NOW, codefendants Benworth Capital Partners LLC ("Benworth FL") and Benworth Capital Partners PR LLC ("Benworth PR"), specially appearing without submitting to the Court's jurisdiction, through the undersigned counsel, and respectfully submit this motion for leave to file a reply in response to *Plaintiff Womply's Consolidated Memorandum of Law in Opposition to Benworth Capital Partners PR LLC's and Benworth Capital Partners LLC's Motions to Dismiss* (D.E. 49), and for an extension of time of 10 days to file the reply brief, until May 11, 2023.

1. On April 26, 2023, Plaintiff Womply filed its opposition to Benworth PR and Benworth FL's motions to dismiss.

2. Pursuant to Local Rule 7(c), Plaintiffs' term to seek leave of court and file a reply brief expires on May 1, 2023. Plaintiffs hereby timely move for leave to reply and seek an

extension of ten (10) days to file a reply brief, until May 11, 2023, pursuant to Local Rule 6, for good cause shown.

3. Plaintiffs will respond to new arguments in the opposition and characterizations of the movants' arguments that are incorrect or misleading and require clarification. This includes, without limitation, Plaintiff's arguments surrounding their claim for prejudgment attachment, and case law cited for the first time in the opposition brief.

4. The appearing defendants' requested extension of ten (10) days, until May 11, 2023, to file their proposed reply is necessary due to various pre-scheduled conflicting deadlines in other cases that will prevent the undersigned from responsibly completing the required research and drafting of this reply by the current deadline of May 1. Moreover, certain of the undersigned counsel who principally were engaged in briefing Benworth PR's motion to dismiss had pre-scheduled travel dates from April 27-May 1, that also conflict with the current deadline.

5. The undersigned certify that this request does not have a dilatory intent, and is sought in the interest of justice, to ensure the Court has complete briefing on the matters pending before it.

WHEREFORE, Benworth PR and Benworth FL respectfully request that the Court grant them leave to file a joint reply in support of their motions at D.E. 34 and 35, by no later than May 11, 2023.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, today April 28, 2023.

CERTIFICATION: The undersigned certify that this document was filed on this date with the Clerk of Court using the CM/ECF system, which will serve notice on all attorneys of record.

[SIGNATURE PAGE FOLLOWS]

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