UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

3M COMPANY

Plaintiff,

CASE NO. 8:20-cv-1003-T-35CPT

v.

TAC2 GLOBAL LLC

Defendant.
_____/

UNOPPOSED MOTION FOR ADDITIONAL EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendant, TAC2 GLOBAL, LLC ("TAC2" or "Defendant"), pursuant to Rule 6 of the Federal Rules of Civil Procedure, by and through its undersigned counsel, hereby moves for an additional extension to the deadline to respond to Plaintiff's Complaint [D.E. 1]. In support of this motion, Defendant states the following:

1. This is action consists of an Eight Count complaint asserting the following causes of action: Violation of Florida's Unfair and Deceptive Trade Practices Act ("FDUTPA"); Trademark Infringement Under Fla. Stat. 495.131; Dilution under Fla. Stat. §495.151; Unfair Competition under Florida Common Law; False Advertising Under the Lanham Act; Trademark Infringement under the Lanham Act; Unfair Competition, False Endorsement, False Association, and False Designation of Origin Under the Lanham Act; and Trademark Dilution under the Lanham Act.

2. Defendant was served with this lawsuit on May 6, 2020.

3. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, Defendant's response to Plaintiff's Complaint was due on May 27, 2020.

4 On May 26, 2020, Defendant filed an Unopposed Motion for Extension of Time to Respond to Complaint [D.E. 36] and stated Defendant's counsel needed more time to respond due to handling the response to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction.

5. This Court granted Defendant's request for an extension up to and through June 2, 2020, to respond to the Complaint [D.E. 37].

6. The hearing on Plaintiff's Motion for Preliminary Injunction is scheduled for June 3, 2020. Simultaneously with this Motion the parties have filed a Joint Motion to Continue Hearing on Preliminary Injunction asking that the hearing be continued for at least 14 days because the parties are engaged in meaningful settlement communications and are hoping to resolve the entire case or at least the preliminary injunction issues without the need for an additional hearing.

7. Defendant is requesting an additional 10 day extension of time to respond to the Complaint, until June 12, 2020 while the parties discuss potential resolution of the claims.

MEMORANDUM OF LAW

Federal Rule of Civil Procedure, Rule 6(b) provides that the Court may, for good cause extend the time for an action upon motion of a party prior to the original deadline. As stated above, Defendant has provided good cause for an additional extension to the deadline to respond to the Complaint due to the ongoing settlement negotiations between the parties. There will be no prejudice to the Court or the parties if the Unopposed Motion is granted.

WHEREFORE, the Defendant's counsel respectfully requests that this Court grant this Unopposed Motion for Additional Extension of Time to Respond to Complaint until June 12, 2020, and for any other relief as the Court may allow.

/s/ Amy E. Stoll
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CERTIFICATE OF GOOD FAITH

DEFENDANT'S COUNSEL HEREBY CERTIFIES that it conferred with Plaintiff's counsel, in good faith and in accordance with Local Rule 3.01(g), and Plaintiff's counsel agreed to the requested additional extension.

CERTIFICATE OF SERVICE

DEFENDANT'S COUNSEL HEREBY CERTIFIES that on June 1, 2020, a true and correct copy of this Motion was electronically filed with the Clerk of Court using the CM/ECF system so that notice will be sent to all counsel of record.

/s/ Amy E. Stoll
Amy E. Stoll, Esquire
Florida Bar No. 150959