

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 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 to extend 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 is due on May 27, 2020.

4 Plaintiff filed a Motion for Temporary Restraining Order and Preliminary Injunction [D.E. 8] just five (5) days after Plaintiff's Complaint was filed and served said motion on Defendant on May 8, 2020, requiring a response by May 22, 2020.

5. Defendant's counsel has prepared a response to Plaintiff's Motion for Temporary Restraining Order and Preliminary Injunction [D.E. 34] and is requesting a short extension just one (1) extra week to prepare a response to Plaintiff's Complaint as the Complaint involves numerous counts and complex legal issues.

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, Plaintiff has provided good cause to extend the deadline to respond to the Complaint due to the nature of the issues involved and the necessity of responding to the Preliminary Injunction Motion. 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 Extension of Time to Respond to Complaint for an additional week, or until June 3, 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 extension.

CERTIFICATE OF SERVICE

DEFENDANT’S COUNSEL HEREBY CERTIFIES that on May 26, 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