

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

OTO ANALYTICS, LLC,

Plaintiff,

vs.

Civil No. 23-1034 (GMM)

BENWORTH CAPITAL PARTNERS PR LLC,
BENWORTH CAPITAL PARTNERS LLC,
BERNARDO NAVARRO and CLAUDIA
NAVARRO,

Defendants.

MOTION TO ALLOW FILING OF REPLY BRIEF INSTATER

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 allege and pray as follows:

1. On April 29, 2023, the Court granted the appearing defendants leave to file a reply brief in support of their motions to dismiss, and an extension of time until May 11, 2023 to file the reply brief. (D.E. 55 & 56).

2. Due to unforeseen complications, the undersigned were not able to file the reply brief yesterday, within the original period requested and granted by the Court.

3. The undersigned respectfully request that the Court allow the filing today of the reply brief, with an additional day extension. The extra day should not cause undue delay or prejudice on the parties, and the undersigned certify that this request is made in good faith and not

with a dilatory intent. It is sought in the interest of justice, to ensure the Court has complete briefing on the matters pending before it.

WHEREFORE, it is respectfully requested that the Court allow the filing of the Joint Reply Brief instant, with an additional day extension on the original period allotted at D.E. 56.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, today May 12, 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.

FERRAIUOLI LLC

PO Box 195168
San Juan, PR 00919-5168
Tel.: 787.766.7000
Fax: 787.766.7001

s/ Roberto A. Cámara-Fuertes

Roberto A. Cámara-Fuertes

USDC-PR 219002

Email: rcamara@ferraiuoli.com

s/ Jaime A. Torrens-Dávila

Jaime A. Torrens-Dávila

USDC-PR 223810

Email: jtorrens@ferraiuoli.com

/s/ Mónica Ramos Benítez

Mónica Ramos-Benítez

USDC-PR 308405

Email: mramos@ferraiuoli.com

Counsel for Benworth Capital Partners LLC

CASELLAS ALCOVER & BURGOS PSC

PO Box 364924
San Juan, PR 00936-4924
Tel. (787) 756-1400
Fax. (787) 756-1401

rcasellas@cabprlaw.com
cloubriel@cabprlaw.com

/s/ Ricardo F. Casellas
USDC-PR Bar No. 203114

/s/ Carla S. Loubriel Carrión
USDC-PR Bar No. 227509

Counsel for Benworth Capital Partners PR LLC