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February 27, 2025

VIA ECF

The Honorable Vera M. Scanlon
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Kolbert v. Benworth Capital Partners LLC et al.*, Case No. 1:25-cv-00117-FB-VMS
Request for Extension of Time to Respond to Complaint

Dear Judge Scanlon:

Pursuant to Local Rule 7.1(e), on behalf of Defendant Toby Scammell, we respectfully submit this Letter Motion for Extension of Time to Respond to the Complaint of Plaintiff William Kolbert from March 3, 2025 to March 14, 2025. Plaintiff's counsel consented to this request, this is the first request for an extension of the aforementioned deadline, and the requested extension does not impact any other scheduled Court appearances or deadline. Mr. Scammell reserves all rights, including to challenge the sufficiency of service of process.

We are available at the Court's convenience should there be any questions on the above.

Respectfully submitted,



Alexander L. Cheney
Attorney for Oto Analytics Inc. and Toby Scammell