

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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MIKHAIL FRIDMAN, <i>et al.</i> ,		)	
		)	
	<b>Plaintiffs,</b>	)	
		)	
v.		)	Civil Case No. 1:17-cv-2041-RJL
		)	
<b>ORBIS BUSINESS INTELLIGENCE</b>		)	
<b>LIMITED, <i>et al.</i></b>		)	
		)	
	<b>Defendants.</b>	)	
<hr/>		)	

**CONSENT MOTION FOR AN EXTENSION OF TIME TO  
RESPOND TO DEFENDANTS’ THIRD MOTION TO COMPEL**

Plaintiffs Mikhail Fridman, Petr Aven, and German Khan respectfully request an extension of 14 days to respond to Defendant Bean LLC’s And Glenn Simpson’s Motion To Compel Production Of Plaintiffs’ Financial Records And Other Documents Relevant To Damages And Substantial Truth And To Revise Plaintiffs’ Answer To Interrogatory No. 20 And Rule 26(a)(1)(A)(iii) Disclosure (“Motion To Compel”) (Dkt. 111). Defendants filed the Motion To Compel—Defendants’ third motion to compel additional discovery—on October 27, 2020. Under the Local Rules, Plaintiffs’ deadline to file their opposition memorandum is currently November 10, 2020.

Plaintiffs seek an extension of 14 days so that they may adequately respond to Defendants’ Motion To Compel. Not only does Defendants’ motion seek to compel documents and revised responses to an interrogatory and a Rule 26(c) disclosure relating to Plaintiffs’ damages claims, but Defendants contend that Plaintiffs’ counsel has violated Fed. R. Civ. P. 26(g). Additionally, Plaintiff Fridman’s deposition is scheduled to take place on November 17,

2020. Plaintiffs request this extension of time so that they may thoroughly respond to Defendants' serious allegation and also address Defendants' arguments to compel discovery.

Consequently, Plaintiffs request that their Opposition to Defendants' Motion To Compel be due on or before November 24, 2020, and Defendants' Reply, if any, be due on or before December 8, 2020. These extensions, if granted, will not affect any scheduled deadlines in this case.

Counsel for Plaintiffs and Defendants have conferred regarding the relief requested in this motion and submit this motion jointly. A Proposed Order is attached.

Dated: November 9, 2020

Respectfully submitted,

/s/ Alan S. Lewis

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on November 9, 2020, I filed the foregoing Consent Motion For An Extension Of Time To Respond To Defendants' Third Motion To Compel and a proposed order via CM-ECF which serves a copy on all counsel of record.

*/s/ Alan S. Lewis*

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ORBIS BUSINESS INTELLIGENCE	)	
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	)	
Defendants.	)	
_____	)	

**ORDER**

Upon consideration of the Consent Motion For An Extension Of Time To Respond To Defendants’ Third Motion To Compel and the consent of counsel, the Court **ORDERS** that:

The Consent Motion For An Extension Of Time To Respond To Defendants’ Third Motion To Compel is **GRANTED**;

Plaintiffs’ opposition is due on or before November 24, 2020; and

Defendants’ reply, if any, is due on or before December 8, 2020.

**SO ORDERED.**

Dated: \_\_\_\_\_

\_\_\_\_\_  
RICHARD J. LEON  
Senior United States District Judge