

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

MIKHAIL FRIDMAN, PETR AVEN, and )  
GERMAN KHAN, )

*Plaintiffs,* )

v. )

BEAN LLC (a/k/a FUSION GPS) and GLENN )  
SIMPSON, )

*Defendants.* )

Case No. 1:17-cv-02041 (RJL)

**CONSENT MOTION FOR EXTENSION OF TIME TO  
FILE A RESPONSE TO DEFENDANTS'  
MOTIONS TO DISMISS THE AMENDED COMPLAINT**

Plaintiffs Mikhail Fridman, Petr Aven and German Khan (collectively "Plaintiffs") respectfully request an extension of time until March 12, 2018 to file their responses to Defendants' Motion to Dismiss the Complaint for Failure to State a Claim and Defendants' Special Motion to Dismiss the Amended Complaint Pursuant to the D.C. Anti-SLAPP Act (the "Motions").

Defendants filed the Motions on January 29, 2018. Accordingly, a response would be due on or before February 12, 2018. Undersigned counsel for Plaintiffs has conferred with counsel for Defendants, Steven M. Salky, and Mr. Salky consents to the relief requested. An order agreed upon by the parties is attached to this motion.

Dated: February 5, 2018

Respectfully submitted,

/s/ Alan S. Lewis

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*Counsel for Plaintiffs  
Mikhail Fridman, et al.*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of February 2018, I electronically filed and served the foregoing using the CM/ECF system.

/s/ Alan S. Lewis  
Alan S. Lewis

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**PROPOSED ORDER**

Before the Court is the Consent Motion for Extension of Time to File a Response to Defendants’ Motion to Dismiss the Complaint for Failure to State a Claim and Defendants’ Special Motion to Dismiss the Complaint Pursuant to the D.C. Anti-SLAPP Act (“Motion to Extend Time”). Upon consideration of the Motion to Extend Time and consent of counsel for Defendants, the Court ORDERS that:

Plaintiffs’ Motion to Extend Time is GRANTED; and

Plaintiffs shall respond to Defendants’ Motions on or before Monday, March 12, 2018.

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Richard J. Leon  
United States District Judge