

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

MIKHAIL FRIDMAN, PETR AVEN, and)	
GERMAN KHAN,)	
)	
<i>Plaintiffs,</i>)	
)	Case No. 1:17-cv-02041 (RJL)
v.)	
)	
BEAN LLC (a/k/a FUSION GPS) and GLENN)	
SIMPSON,)	
)	
<i>Defendants.</i>)	

SECOND 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 19, 2018 to file their responses to Defendants’ Motion to Dismiss the Amended 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. Pursuant to an Order of this Court dated February 9, 2018 granting Plaintiffs’ Consent Motion for Extension of Time to File a Response to Defendants’ Motions, Defendants’ responses are due March 12, 2018. Undersigned counsel for Plaintiffs has conferred with counsel for Defendants, Steven M. Salky, and Mr. Salky consents to the relief requested herein. An order agreed upon by the parties is attached.

Dated: March 5, 2018

Respectfully submitted,

/s/ Alan S. Lewis
 Alan S. Lewis (#NY0252)
 John J. Walsh
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Counsel for Plaintiffs Mikhail Fridman, et al.

CERTIFICATE OF SERVICE

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

/s/ Alan S. Lewis
Alan S. Lewis

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BEAN LLC (a/k/a FUSION GPS) and GLENN)	
SIMPSON ,)	
)	
<i>Defendants.</i>)	
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PROPOSED ORDER

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

Plaintiffs’ Second Motion to Extend Time is GRANTED; and

Plaintiffs shall respond to Defendants’ Motion to Dismiss the Amended Complaint for Failure to State a Claim and Defendants’ Special Motion to Dismiss the Amended Complaint on or before Monday, March 19, 2018.

Richard J. Leon
United States District Judge