

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

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

**JOINT MOTION FOR EXTENSION OF TIME TO FILE A RESPONSE TO  
DEFENDANTS’ MOTION TO COMPEL PLAINTIFFS TO PRODUCE  
DOCUMENTS AND TO FILE A REPLY IN FURTHER SUPPORT**

Plaintiffs Mikhail Fridman, Petr Aven and German Khan respectfully request an extension of time to and including July 10, 2020 to file their response to Defendants’ Motion to Compel Plaintiffs’ Production of Their Documents (the “Motion”) (Dkt. 78). Defendants filed the Motion on June 12, 2020 and Plaintiffs’ response presently is due on June 26, 2020. Plaintiffs seek additional time to adequately respond to the numerous legal and factual issues raised in Defendants’ forty-page Motion and 75 accompanying exhibits.

Defendants respectfully request that if the Court grants the extension requested by Plaintiffs then Defendants’ time to file a reply be extended to and including July 24, 2020. Under the present briefing schedule, Defendants’ reply is due on July 3, 2020.

Counsel for Plaintiffs has conferred with counsel for Defendants regarding the relief requested herein. Each counsel consents to the relief requested by the other. The Court’s granting of this motion will not affect any other previously scheduled deadlines in this case. A Proposed Order is attached.

Dated: June 19, 2020

Respectfully submitted,

/s/ Joshua A. Levy  
Joshua A. Levy (DC Bar No. 475108)  
Rachel M. Clattenburg (DC Bar No. 1018164)  
Zachary Blau (DC Bar No. 1600714)  
LEVY FIRESTONE MUSE LLP  
1401 K St. NW, Suite 600  
Washington, DC 20005  
Tel: (202) 845-3215  
Fax: (202) 595-8253  
jal@levyfirestone.com  
rnc@levyfirestone.com  
zblau@levyfirestone.com

*Counsel for Defendants*

/s/ Kim Sperduto  
Alan S. Lewis (#NY0252)  
CARTER LEDYARD & MILBURN LLP  
2 Wall Street  
New York, NY 10005  
Tel: (212) 732-3200  
Fax: (212) 732-3232  
lewis@clm.com

-and-

Kim Sperduto (DC Bar No. 416127)  
SERDUTO THOMPSON & GASSLER PLC  
1747 Pennsylvania Avenue, NW, Suite 1250  
Washington, DC 20006  
Tel: (202) 408-8900  
Fax: (202) 408-8910  
ksperduto@stglawdc.com

*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of June 2020, I electronically filed and served the foregoing using the CM/ECF system.

/s/ Kim Sperduto  
Kim Sperduto

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

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

**PROPOSED ORDER**

Before the Court is the Joint Motion for Extension of Time to File A Response To Defendants’ Motion To Compel Plaintiffs’ Production of Their Documents And To File A Reply In Further Support (“Joint Motion to Extend Time”). Upon consideration of the Joint Motion to Extend Time and mutual consent of counsel, the Court ORDERS that:

The Joint Motion to Extend Time is GRANTED; and

Plaintiffs shall file an opposition to Defendants’ Motion to Compel on or before July 10, 2020 and Defendants shall file a reply to Plaintiffs’ opposition on or before July 24, 2020.

\_\_\_\_\_  
Richard J. Leon  
United States District Judge