

**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.

Civil Case No. 1:17-cv-2041-RJL

**JOINT MOTION FOR EXTENSION OF TIME
TO RESPOND TO MOTIONS TO COMPEL**

Defendants Bean LLC and Glenn Simpson and Plaintiffs Mikhail Fridman, Petr Aven, and German Khan respectfully request extensions of two weeks to respond to the other party's Motion to Compel, and of one week to file a reply in support of their Motion to Compel.

On August 14, 2020, Defendants Bean LLC and Glenn Simpson filed a Motion to Compel Plaintiffs' Production of Their Documents (ECF 94). On August 14, 2020, Plaintiffs Mikhail Fridman, Petr Aven, and German Khan filed a Motion to Compel Production of Documents Withheld as Privileged by Defendants (ECF 95). Under the Local Rules, both parties have 14 days to file an opposition brief to the other party's Motion to Compel and 7 days to file a reply brief.

Both parties seek additional time to adequately respond to other party's filings. Therefore they respectfully request an extension of 14 days to file opposition briefs to the Motions to Compel (ECF 94 & 95) and an extension of 7 days to file reply briefs to the Motions to Compel. Specifically, the briefing schedule requested is as follows:

- Plaintiffs' Opposition to Defendants' Motion to Compel Plaintiffs' Production of Their Documents (ECF 94) and Defendants' Opposition to Plaintiffs' Motion to Compel Production of Documents Withheld as Privileged by Defendants (ECF 95): due **September 11, 2020**.
- Plaintiffs' Reply in Support of Plaintiffs' Motion to Compel Production of Documents Withheld as Privileged by Defendants (ECF 95) and Defendants' Reply in Support of Defendants' Motion to Compel Plaintiffs' Production of Their Documents (ECF 94): due **September 25, 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: August 19, 2020

Respectfully submitted by:

/s/ Joshua A. Levy

/s/ Kim Sperduto

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 19, 2020, I filed the foregoing using CM-ECF which serves a copy on all counsel of record.

/s/ Kim Sperduto
Kim Sperduto

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MIKHAIL FRIDMAN, PETR AVEN, and
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BEAN LLC a/k/a FUSION GPS, and GLENN
SIMPSON,

Defendants.

No. 1:17-cv-2041-RJL

PROPOSED ORDER

Upon consideration of the parties' Joint Motion for Extension of Time to Respond to Motions to Compel and mutual consent of counsel, the Court **ORDERS** that:

The Joint Motion for Extension of Time to Respond to Motions to Compel is **GRANTED**; and

Plaintiffs' Opposition to Defendants' Motion to Compel Plaintiffs' Production of Their Documents (ECF 94) and Defendants' Opposition to Plaintiffs' Motion to Compel Production of Documents Withheld as Privileged by Defendants (ECF 95) are due **September 11, 2020**; and

Plaintiffs' Reply in Support of Plaintiffs' Motion to Compel Production of Documents Withheld as Privileged by Defendants (ECF 95) and Defendants' Reply in Support of Defendants' Motion to Compel Plaintiffs' Production of Their Documents (ECF 94) are due **September 25, 2020**.

SO ORDERED.

Dated: _____

RICHARD J. LEON
United States District Judge