

**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

**CONSENT MOTION FOR EXTENSION OF TIME
FOR DEFENDANTS TO FILE REPLY TO INTERVENOR AO ALFA-BANK'S
OPPOSITION**

Defendants Bean LLC and Glenn Simpson (collectively, "Defendants") respectfully request an extension of time until September 4, 2020 to file their reply to Intervenor AO Alfa-Bank's Memorandum of Points and Authorities in Opposition to Defendants' Motion to Compel (Dkt. No. 80-3, filed August 21, 2020). Defendants request the extension to adequately respond to Intervenor AO Alfa-Bank's Opposition. This extension would not affect any of the scheduled deadlines in this case.

Undersigned counsel for Defendants conferred with counsel for Plaintiffs and counsel for Intervenor AO Alfa-Bank, and they consent to the relief requested. A proposed order is attached.

Dated: August 24, 2020

Respectfully submitted by:

/s/ Joshua A. Levy

Joshua A. Levy (D.C. Bar No. 475108)
Rachel M. Clattenburg
(D.C. Bar No. 1018164)
LEVY FIRESTONE MUSE LLP
1401 K St. NW, Suite 600
Washington, DC 20005
Tel: (202) 845-3215
Fax: (202) 595-8253
jal@cunninghamlevy.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 24, 2020, I filed the foregoing using CM-ECF which serves a copy on all counsel of record.

/s/ Joshua A. Levy

Joshua A. Levy

**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.

No. 1:17-cv-2041-RJL

PROPOSED ORDER

Upon consideration of the Consent Motion for Extension of Time For Defendants to File Reply to Intervenor AO Alfa-Bank's Opposition and consent of counsel, the Court **ORDERS** that:

Defendants' Reply to Intervenor AO Alfa-Bank's Memorandum of Points and Authorities in Opposition to Defendants' Motion to Compel (Dkt. No. 80-3) is due on or before September 4, 2020.

SO ORDERED.

Dated: _____

RICHARD J. LEON
United States District Judge