

via U.S. Mail even though he is counsel of record for Defendants. Counsel has been able to obtain a copy of ECF 241 from opposing counsel and is pursuing the answer to the Court's order but does not have ECF 240. Defendants respectfully request that the Court enable a copy of ECF 240 to be sent to Defense counsel by email.

Finally, Defendants have obtained new counsel who is expected to enter an appearance within weeks and the undersigned is working diligently to transition this case to new counsel. This motion is made in good faith and is not filed for purposes of delay. Pursuant to the general principles in the Local Rules, Defendants have conferred with Plaintiff and Plaintiff consents to this extension of time.

Dated: November __, 2025

Respectfully submitted,

s/ Christopher I. Kachouroff
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of November 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which I understand to have served counsel for the parties.

/s/ Christopher I. Kachouroff