

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

US DOMINION, INC., DOMINION)	
VOTING SYSTEMS, INC., and DOMINION)	
VOTING SYSTEMS CORPORATION,)	
)	
Plaintiffs/Counter-Defendants,)	
)	
v.)	
)	
MY PILLOW, INC., and MICHAEL J.)	
LINDELL,)	
)	Case No. 1:21-cv-445 (CJN)
Defendants/Counter and Third-Party)	
Plaintiffs,)	
)	
v.)	
)	
SMARTMATIC USA CORP.,)	
SMARTMATIC INTERNATIONAL)	
HOLDING B.V., SGO CORPORATION)	
LIMITED, AND HAMILTON PLACE)	
STRATEGIES, LLC,)	
)	
Third-Party Defendants.)	
)	

DEFENDANTS' MOTION FOR EXTENSION OF TIME

Defendants Michael J. Lindell and MyPillow, Inc. ("Defendants") move this Court to grant an extension of 30 days to respond to ECF 241 (and ECF 240) and submit a joint status report. Good cause exists for Defendants' request.

First, Defendants' counsel is unable to access sealed orders ECF 241 (or ECF 240) but has contacted the Clerk's office in an attempt to obtain copies of those documents. The undersigned has left a message with the Court's deputy to obtain access or copies of the documents that are under seal. Presumably, the Court's deputy has been unavailable. Defense Counsel has not received nor can he access a copy of ECF 240 or 241 through ECF and has not received any copies

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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*Attorneys for Defendants My Pillow, Inc. and
 Michael J. Lindell*

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*