

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

Case Number 24-cv-21050-CMA

PRESIDENT DONALD J. TRUMP, an  
individual,

Plaintiff,

v.

AMERICAN BROADCASTING COMPANIES,  
INC., a Delaware corporation, ABC NEWS,  
INC., a Delaware corporation, and GEORGE  
STEPHANOPOULOS, an individual,

Defendants.

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
FOR CERTAIN DEFENDANTS TO RESPOND TO COMPLAINT AND TO SET A  
UNIFORM RESPONSE DATE FOR ALL DEFENDANTS**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendants American Broadcasting Companies, Inc. and ABC News, Inc. move this Court for an extension of time in which to file a response to the Complaint (Dkt. No. 1), to May 10, 2024. All Defendants also move this Court to set May 10, 2024 as the date for all Defendants to file a response to the Complaint.

1. On March 18, 2024, Plaintiff former President Donald J. Trump ("Plaintiff") filed the instant defamation action in this court against Defendants. Plaintiff bases his claims on an interview conducted by Defendant Stephanopoulos of South Carolina Congresswoman Nancy Mace on *This Week with George Stephanopoulos*, which aired on ABC on March 14, 2024. During this interview, Defendant Stephanopoulos referenced aspects of the civil action instituted by E. Jean Carroll against Plaintiff in the Southern District of New York. (the "Carroll Litigation").

2. On March 19, 2024, Defendants American Broadcasting Companies, Inc. and ABC News, Inc. were personally served. The date for their response to the Complaint is currently April 9, 2024.

3. On March 20, 2024, counsel for Defendants reached out to Plaintiff's counsel offering to accept service on behalf of all unserved Defendants (i.e., Defendant Stephanopoulos) pursuant to Rule 4(d). Counsel for Plaintiff consented. Service on Defendant Stephanopoulos was therefore effected as of March 20, 2024.

4. The date for Defendant Stephanopoulos's response is currently May 20, 2024.

5. Federal Rule of Civil Procedure 6(b) provides that the Court, for good cause shown, may order the period enlarged if a request is made prior to the expiration of the period originally prescribed.

6. Defendants request that the Court set a uniform response date for all Defendants of May 10, 2024. That date will extend the deadline for the corporate Defendants' response by 30 days, while reducing the deadline for Defendant Stephanopoulos's response by 10 days. Plaintiff consents to this request.

7. The Complaint in this case raises two claims concerning twelve allegedly defamatory statements that relate to Defendants' reporting on findings in the Carroll Litigation. The requested extension will allow undersigned counsel sufficient time to conduct an investigation of Plaintiff's claims, review the record in the Carroll Litigation, and formulate consolidated and complete responses to the Complaint.

8. Accordingly, Defendants respectfully request this Court enter an order granting that the deadline for all Defendants to respond to the Complaint will be May 10, 2024.

9. The two corporate Defendants have demonstrated good cause to extend the deadline to file their response. This is the first extension request made by any Defendant on this issue and is timely made in good faith and not otherwise interposed for the purposes of harassment or delay. No party waives any rights or defenses by seeking or consenting to the relief sought.

#### **LOCAL RULE 7.1 CERTIFICATION**

10. Undersigned counsel, Rachel E. Fugate, certifies that counsel for Defendants conferred with Plaintiff's counsel on March 20, 2024 and again on March 27, 2024. Plaintiff's counsel agreed to the granting of the requested extension and setting of a uniform response date.

WHEREFORE, Defendants respectfully request this Court enter an order setting the deadline for Defendants to respond to the Complaint at May 10, 2024.

Dated: March 27, 2024

Respectfully Submitted,

SHULLMAN FUGATE PLLC

**Rachel E. Fugate**

Rachel E. Fugate (Florida Bar No. 144029)  
[rfugate@shullmanfugate.com](mailto:rfugate@shullmanfugate.com)

Minch Minchin (Florida Bar No. 1015950)  
[mminchin@shullmanfugate.com](mailto:mminchin@shullmanfugate.com)

2101 Vista Parkway Suite 4006  
West Palm Beach, Florida 33411  
(813) 935-5098

DAVIS WRIGHT TREMAINE LLP

Nathan Siegel (*pro hac vice forthcoming*)

1301 K Street NW, Suite 500

Washington, DC 20005

Phone: 202-973-4237

Email: [nathansiegel@dwt.com](mailto:nathansiegel@dwt.com)

Elizabeth A. McNamara (*pro hac vice  
forthcoming*)

1251 Avenue of the Americas, 21st Floor

New York, NY 10020

Phone: (212) 489-8230

Email: [lizmcnamara@dwt.com](mailto:lizmcnamara@dwt.com)

*Attorneys for Defendants American Broadcasting  
Companies, Inc., ABC News, Inc., and George  
Stephanopoulos*