

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

COMPOSITE EFFECTS, LLC,

Plaintiff,

Versus

**ALL ELITE WRESTLING, LLC and
AUSTIN MATELSON,**

Defendants.

**CIVIL ACTION NO. 2:22-cv-05351-
EEF-MBN**

DISTRICT JUDGE FALLON

MAGISTRATE JUDGE NORTH

**AGREED MOTION FOR EXTENSION OF
DEADLINE TO RESPOND TO COMPLAINT**

Defendant All Elite Wrestling, LLC (“AEW”) hereby moves the Court to grant AEW until March 21, 2023 to respond to the Complaint filed by Plaintiff Composite Effects, LLC (Plaintiff”). In support of this Motion, AEW states as follows:

1. This case was filed by Plaintiff on December 20, 2022. By way of the Complaint (Dkt. 1), Plaintiff asserts various claims against AEW and its Co-Defendant Austin Matelson (“Mattelson”).

2. AEW’s initial deadline to respond to the Complaint was February 1, 2023 (Dkt. 9). That deadline was previously extended until February 22, 2023 (Dkt. 12).

3. Mattelson provided a waiver of service, so his deadline to respond to the Complaint is March 21, 2023 (Dkt. 8).

4. AEW seeks an extension of time to respond to the Complaint until March 21, 2023, so that its response deadline runs concurrently with Mattelson’s response deadline.

5. Federal Rule of Civil Procedure 6(b) provides that, “[w]hen an act . . . must be done within a specified time, the court may, for good cause, extend the time with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires.” Fed.R.Civ.P. 6(b)(1)(A).

6. There are two defendants in this action, whose defenses and arguments will likely be aligned. As such, AEW submits that good cause exists for the deadlines of the two defendants to respond to the Complaint to run concurrently.

7. This Motion is made in good faith, and not for purposes of undue delay or other wrongful purposes.

8. Counsel for Plaintiff has consented to this Motion.

WHEREFORE, AEW respectfully request that the Court extend the deadline for AEW to respond to the Complaint until March 21, 2023.

Respectfully submitted,

/s/Bradley M. Stohry

Bradley M. Stohry (Admitted *Pro Hac Vice*)
REICHEL STOHR DEAN LLP
525 S. Meridian St., Suite 1A2
Indianapolis, IN 46225
Telephone: (317) 501-2891
Facsimile: (317) 454-1349
brad@rsindy.com

Brad E. Harrigan (Bar No. 29592)
TOLAR HARRIGAN & MORRIS LLC
1055 St. Charles Avenue, Suite 208
New Orleans, LA 70130
Telephone: (504) 571-5317
Facsimile: (504) 571-5437
bharrigan@nolaipa.com
Counsel for All Elite Wrestling, LLC

CERTIFICATE OF SERVICE

I hereby certify that on February 17, 2023, a copy of the foregoing pleading was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the court's electronic filing system.

/s/Bradley M. Stohry

Bradley M. Stohry