

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,)	Civil Action No.: 2:22-cv-547
)	
Plaintiff,)	
)	
v.)	Electronically Filed
)	
MICHAEL RUSSIN, RUSSIN)	
FINANCIAL, RUSSIN GROUP,)	
SIMON ARIAS, III, ARIAS AGENCIES,)	
S.A. ARIAS HOLDINGS, LLC,)	
AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
)	
Defendants.		

**DEFENDANT MICHAEL RUSSIN’S RESPONSE TO
PLAINTIFF’S AMENDED MOTION TO EXTEND DISCOVERY DEADLINE**

AND NOW, comes Defendant, Michael Russin, by and through his attorneys Benjamin D. Webb, Esquire and Cozza Law Group PLLC, and files the within Response to Plaintiff’s Amended Motion to Extend Discovery Deadline, averring as follows:

1. The discovery deadline in this case was set via Order for February 28, 2023. ECF No. 44.
2. Plaintiff waited until February 15, 2023, to propose dates to take the deposition of Natalie D’Achilles Price (“Price”).
3. Plaintiff has been aware of Ms. Price as a potential source of information since her Complaint was filed on April 11, 2022. ECF. No. 1.
4. *Insider* published an article relative to this case on February 24, 2023. The article is based, in large part, on information supplied by Plaintiff and her attorney.

5. Because Plaintiff was instrumental in providing the information for the article, she should not be permitted to claim that she was only just made aware of the contents of the article, and should not be granted additional time to gather information from *unidentified* witnesses.

6. Plaintiff has failed to provide any evidence that the supposed new witnesses have information related to the claims that remain before this court against Defendant Michael Russin.

7. Plaintiff's failure to obtain discoverable information from Ms. Price and any additional witnesses was a result of a lack of her own diligence.

WHEREFORE, Defendant, Michael Russin, respectfully requests that Plaintiff's Amended Motion to Extend Discovery Deadlines be DENIED.

Dated: March 6, 2023

Respectfully submitted,

Cozza Law Group PLLC

s/Benjamin D. Webb

Benjamin D. Webb, Esquire

PA I.D. No. 328170

400 Holiday Drive, Suite 210

Pittsburgh, Pennsylvania 15220

(412) 294-8444

bwebb@cozzalaw.com

Counsel for Defendant Michael Russin

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Response to Plaintiff's Amended Motion to Extend Discovery Deadlines has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb

Benjamin D. Webb, Esquire