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PREPARED FOOD PHOTOS, INC.
f/k/a ADLIFE MARKETING &
COMMUNICATIONS CO., INC.,

Plaintiff,

v.

POOL WORLD, INC.,

Defendant.

Civil Action No. 2:23-cv-00160-TOR

**PLAINTIFF’S UNOPPOSED
MOTION FOR EXTENSION OF
TIME TO RESPOND TO MOTION
FOR SUMMARY JUDGMENT**

1 Plaintiff Prepared Food Photos, Inc. f/k/a Adlife Marketing &
2 Communications Co., Inc. (“Plaintiff”) hereby files this motion for a 14-day
3 extension of time to respond to defendant Pool World, Inc.’s (“Defendant”) Motion
4 for Summary Judgment, and states as follows:

5
6 1. On July 11, 2025, Defendant filed its Motion for Summary Judgment.

7 2. Pursuant to Local Rule 7(c)(2)(B), Plaintiff’s response to the Motion
8 for Summary Judgment is currently due on or before August 1, 2025.

9 3. Plaintiff is requesting a 14-day extension of time to respond to the
10 Motion for Summary Judgment. The attorney primarily responsible for drafting
11 Plaintiff’s response to the Motion for Summary Judgment (Lauren Hausman, Esq.)
12 is currently out of the country on a pre-planned vacation and does not return to the
13 office until August 4, 2025. Plaintiff’s other principal attorney (Daniel DeSouza)
14 is currently traveling out-of-state for hearings and has a substantial amount of
15 case/motion deadlines this week that have prevented him from being able to assist
16 Ms. Hausman with drafting a response to the Motion for Summary Judgment.
17

18 4. Given that Defendant filed the Motion for Summary Judgment prior
19 to discovery closing and the requested extension will therefore not delay or
20 prejudice these proceedings, Plaintiff requests an additional 14 days to allow its
21 counsel to properly respond to the Motion for Summary Judgment, much of which
22 requires coordination with Plaintiff’s representatives (including Plaintiff’s
23
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1 President who is admitted to a hospital due to an emergency issue) to develop the
2 factual record in response to Defendant’s statement of facts.

3 5. Prior to filing this Motion, Plaintiff conferred with counsel for
4 Defendant who indicated that Defendant does not oppose the foregoing relief,
5 though with certain conditions unrelated to this motion (e.g., that Plaintiff must
6 produce certain documents and agree to certain stipulations prior to such consent
7 becoming effective). Although Plaintiff believes the imposition of such conditions
8 to be improper, it has endeavored to meet those conditions and produce the subject
9 documents prior to filing this Motion. To the extent Defendant contends its
10 conditions have still not been met, Plaintiff will of course continue to work with
11 Defendant to complete such – but Defendant should not be allowed to hold a
12 proverbial gun over Plaintiff’s head in agreeing to an otherwise perfunctory request
13 for an extension.
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16 **WHEREFORE**, Plaintiff respectfully requests that the Court enter an
17 Order: (a) granting this Motion and (b) extending the time for Plaintiff to respond
18 to the Motion for Summary Judgment until August 15, 2025.
19

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21 Dated: July 31, 2025.

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By: /s/ Daniel DeSouza
Daniel DeSouza, Esq.
Lauren M. Hausman, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on July 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will electronically serve all counsel of record.

/s/ Daniel DeSouza
Daniel DeSouza, Esq.