

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

THE TRUMP ORGANIZATION LLC
and DTTM OPERATIONS LLC,

Plaintiffs,

CASE NO. 8:25-cv-01962

v.

THE INDIVIDUALS,
CORPORATIONS, LIMITED
LIABILITY COMPANIES,
PARTNERSHIPS, and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendants.

/

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants HEGUO (Def.No.100), ranranYI (Def.No.113), shishiYYun (Def.No.118), siquan (Def.No.121) and XIGEII (Def.No.130) (collectively "Defendants"), by and through counsel, file this Unopposed Motion for a 30-day extension of time to file answer or otherwise respond to Plaintiff's Complaint, and state as follows:

1. Plaintiff filed its Complaint on July 25, 2025. [ECF No. 1]

2. The Court's docket indicates that responsive pleadings were due on September 7, 2025.
3. The parties have been engaged in settlement discussions. The undersigned counsel contacted plaintiff's counsel on September 4, 2025, and both parties agreed to a 30-day extension of time for Defendants to file an answer or otherwise respond to the Complaint.
4. There is no intention by Defendants filing this motion for extension to negatively affect the entry of default against any other non-moving Defendants in this case. The relief sought in this motion is limited to the five Defendants alone.
5. Defendants respectfully request that the Court enter an Order granting this motion and extending the deadline for Defendants to answer or otherwise plead through October 7, 2025, to permit the parties to determine whether settlement is possible, or to file a responsive pleading by that date.
6. This extension of time is not being sought for the purpose of delay or to frustrate the progress of this matter. This extension will not unduly burden Plaintiff.

WHEREFORE, Defendants respectfully request that this Court grant the Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Complaint by October 7, 2025.

Date: 9/5/2025

Respectfully submitted,
/s/ Andrew J. Palmer

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Local Rule 3.01(g) Certification

Pursuant to Local Rule 3.01(g), undersigned counsel certifies that counsel for Defendants has conferred with counsel for Plaintiffs in a good-faith effort to resolve the issues raised in this Motion. Counsel for Plaintiffs do not oppose the requested extension.