UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOSE MARIA DeCASTRO, a/k/a	,)
CHILLE DeCASTRO, a/k/a DELETE)
LAWZ,)
Plaintiff,)
)
v.) C.A. No. 1:22-cv-11421-ADB
)
JOSHUA ABRAMS, a/k/a)
ACCOUNTABILITY FOR ALL, KATE)
PETER, a/k/a MASSHOLE TROLL)
MAFIA,)
Defendants.)
)

DEFENDANTS' JOINT MOTION TO EXTEND TIME TO FILE A RESPONSE TO THE FIRST AMENDED COMPLAINT

Pursuant to Fed. R. Civ. P. 6(b), the defendants jointly move that the Honorable Court extend the time to file responses to plaintiff's First Amended Complaint (ECF No. 62). As grounds for the motion, plaintiff has indicated that it will file a Second Amended Complaint in this action. *See* E-MAIL REQUESTING ASSENT TO AMEND COMPLAINT, attached herewith as "Exhibit A." Pursuant to L. R. 15.1(b), this requires plaintiff to serve a copy of the motion to amend (with the proposed amendment) on the new party fourteen days prior to filing the motion to amend with the Court. Accordingly, the defendants jointly request that the time to file responses to the First Amended Complaint be extended to 21 days after a Second Amended Complaint is properly filed or plaintiff gives notice that he no longer wishes to file a Second Amended Complaint.

Respectfully Submitted, Respectfully Submitted,

/s/ Benjamin J. Wish /s/ Joshua N. Garick

Joshua N. Garick (BBO #674603)

Benjamin J. Wish (BBO #672743)

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Counsel for Kate Peter Counsel for Joshua Abrams

Dated: November 30, 2022

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing:

/s/ Joshua N. Garick

Joshua N. Garick (BBO #674603)

Dated: November 30, 2022