

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ROBERT DAVID STEELE *et al.*,

Plaintiffs,

v.

Civil Action No. 3:17cv601

JASON GOODMAN *et al.*,

Defendants.

MOTION FOR EXTENSION OF TIME

NOW COMES Defendant, Patricia A. Negron (“Ms. Negron” or “Defendant”), by counsel, and moves this Honorable Court for an extension of time to file her responsive pleading to the Motion to Disqualify Counsel for Plaintiff (“Motion”) filed by the Defendant, Jason Goodman (“Mr. Goodman” or “Defendant”), and in support thereof states as follows:

1. Mr. Goodman filed his Motion (ECF No. 165) on November 27, 2019, and pursuant to this Court’s Local Rules, responsive pleadings are due December 11, 2019.
2. Counsel for Ms. Negron continues to review the allegations set forth in the Motion, and requires additional time to respond to the same, as many pertain specifically to Ms. Negron.
3. No party would be prejudiced by the extension. Counsel contacted Mr. Goodman for his consent but did not hear back at the time of this filing.
4. The time to respond has not expired.
5. Accordingly, Patricia A. Negron requests that the Court allow an extension on her deadline to file responsive pleadings to the Motion on or before Friday, December 20, 2019.
6. A proposed Order granting the relief requested, executed by the parties, is attached hereto as **Exhibit A**.

WHEREFORE, Defendant, Patricia A. Negron, hereby requests that the Court enter an Order (1) granting Ms. Negron's Motion for an Extension of Time; (2) providing Ms. Negron with an extension of time to file her responsive pleading to the Motion on or before December 20, 2019; and (3) awarding Ms. Negron such further relief as the Court deems appropriate.

PATRICIA A. NEGRON

By: /s/ Terry C. Frank

Terry C. Frank, Esq. (VSB No. 74890)
E-mail: tcfrank@kaufcan.com
Benjamin A. Wills, Esq. (VSB No. 88109)
E-mail: bawills@kaufcan.com
KAUFMAN & CANOLES, P.C.
1021 E. Cary Street, Suite 1400
Richmond, Virginia 23219
Phone: (804) 771-5700
Fax: (888) 360-9092
Counsel for Defendant Patricia A. Negron

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2019, a true copy of the foregoing is being electronically filed with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Steven S. Biss (VSB No. 32972)
E-mail: stevenbiss@earthlink.net
300 West Main Street, Suite 102
Charlottesville, Virginia 22903
Phone: (804) 501-8272
Fax: (202) 318-4098
Counsel for Plaintiffs

And sent via first-class mail, postage prepaid, to:

Jason Goodman, *Pro Se*
252 7th Avenue, Apt. 6S
New York, NY 10001
truth@crowdsourcethetruth.com

“Queen Tut”
a/k/a Susan A. Lutzke, *Pro Se*
1221 University Ave., Unit D202
Fort Collins, CO 80521

/s/ Terry C. Frank
Terry C. Frank, Esq. (VSB No. 74890)
E-mail: tcfank@kaufcan.com
Kaufman & Canoles, P.C.
1021 E. Cary Street, 14th Floor
Richmond, Virginia 23219
Phone: (804) 771-5700
Fax: (888) 360-9092
Counsel for Defendant Patricia A. Negron