

RANDAZZA
LEGAL GROUP

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August 23, 2023

Via Electronic Filing and E-Mail

Hon. Cathy Seibel
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150
<chambersnysdseibel@nysd.uscourts.gov>

Re: *Project Veritas, et al. v. James O’Keefe, et al., No. 7:23-cv-04533*

Dear Judge Seibel,

Undersigned counsel has the pleasure of representing Plaintiffs Project Veritas and Project Veritas Action Fund in the above-referenced matter. Pursuant to Fed. R. Civ. P. 4(m) & 6(b), Local Civil Rule 7.1(d), and Your Honor’s Individual Practices, § I(E), Plaintiffs move and request the Court extend the time for service of the summons and complaint in this matter for **an additional forty-five days, until October 13, 2023**. In support hereof, Plaintiffs state as follows:

1) The Original Date:

The Complaint in this matter was filed May 31, 2023, rendering the current 90-day deadline for service under Rule 4(m) as **August 29, 2023**.

2) The number of previous requests for adjournment or extension, and the reason for those requests:

None.

3) Whether these previous requests were granted or denied:

Not Applicable.

4) The reason for the instant request:

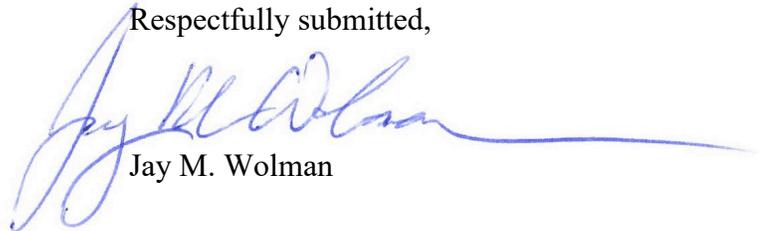
Plaintiffs and Defendants O’Keefe and Transparency 1, LLC, had been engaged in productive discussions to attempt to resolve this case. Were Plaintiffs to have served Defendants, unnecessary litigation costs would potentially have been imposed on both sides. Plaintiff believes an additional 45 days at this point would suffice to advance the goal of out-of-court resolution or to effect service and move forward. Thus, good cause exists to grant a 45-day extension of the deadline to serve the Complaint and Summons in this matter.

- 5) Whether the adversary consents, and, if not, the reasons given by the adversary for refusing to consent:

Defendant James O'Keefe, individually and on behalf of Defendant Transparency 1, LLC d/b/a OKeefe Media Group had relayed to Plaintiffs his consent for the extension. Plaintiff is not presently in communication with Defendants RC Maxwell or Anthony Iatropoulos, and, thus, their consent could not be sought. However, the purpose of the extension is to inure to the benefit of Defendants Maxwell and Iatropoulos, as a resolution with the other two defendants may dispose of the claims against them.

In light of the foregoing, Plaintiffs respectfully request this Honorable Court extend the deadline for service of the Summons and Complaint by 45 days, to October 13, 2023. Thank you for your attention to this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jay M. Wolman", with a long horizontal flourish extending to the right.

Jay M. Wolman