

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

BURTON W. WIAND, not individually
but solely in his capacity as Receiver for
OASIS INTERNATIONAL GROUP,
LIMITED, et al.,

Plaintiffs,

v.

ATC BROKERS LTD., DAVID
MANOUKIAN, and SPOTEX LLC,

Defendants.

Case No. 21-cv-1317

**UNOPPOSED MOTION TO EXTEND DEADLINE
TO RESPOND TO PLAINTIFFS' COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and the Court's inherent authority to control its docket, Defendants, ATC Brokers Ltd. and David Manoukian, move to extend their deadline for responding to Plaintiffs' Complaint (Doc. 1) to **July 26, 2021**. Plaintiffs do not oppose.

Plaintiffs have brought this action in connection with the CFTC's litigation against Ponzi scheme participants—the Oasis entities—in *CFTC v. Oasis International Group Ltd.* Case No. 8:19-cv-886-T-33SPF (M.D. Fla.). ATC Brokers Ltd. and David Manoukian are non-parties in that action.

ATC Brokers Ltd. and Mr. Manoukian were served on June 4. Their current response deadline is June 25. Fed. R. Civ. P. 12(a)(1)(A)(i). As that deadline has

not yet passed, Rule 6(b)(1)(A) affords this Court discretion to extend it “for good cause.” Discretionary extensions “should be liberally granted absent a showing of bad faith . . . or undue prejudice.” *Lizarazo v. Miami-Dade Corr. & Rehab. Dep’t*, 878 F.3d 1008, 1012 (11th Cir. 2017) (quoting *United States v. Miller Bros. Const. Co.*, 505 F.2d 1031, 1035 (10th Cir. 1974)). Good cause exists here to facilitate the careful analysis and early attention to case-management issues warranted in these complex cases, which include questions regarding the Court’s personal jurisdiction over ATC Brokers Ltd. (a U.K. entity).

ATC Brokers Ltd. and Mr. Manoukian respectfully request an extension through July 26, 2021, which is still prior to the deadline for Spotex LLC, another defendant that was afforded an opportunity to waive service, and currently has an August 6 deadline to respond. Dkts. 11 and 12. ATC Brokers Ltd. and Mr. Manoukian have been analyzing the complex jurisdictional issues of this case and have only recently both engaged Greenberg Traurig to defend them in this matter. Allowing counsel time to analyze the complex issues of this case prior to filing a response would move the matter toward a “just, speedy, and inexpensive determination.” Fed. R. Civ. P. 1.

[*Signature page follows*]

Dated: June 22, 2021

Respectfully submitted,

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*Counsel for ATC Brokers Ltd. and David
Manoukian*

RULE 3.01(g) CERTIFICATION

The undersigned certifies that he conferred with Plaintiffs' counsel, who do not oppose the requested relief.

/s/ Christopher Torres
Attorney

CERTIFICATE OF SERVICE

I certify that on June 22, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to counsel of record.

/s/ Christopher Torres
Attorney