

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

CASE NO.: 8:20-cv-00394-MSS-SPF

SECURITIES AND EXCHANGE COMMISSION,)

Plaintiff,)

v.)

**KINETIC INVESTMENT GROUP, LLC and)
MICHAEL SCOTT WILLIAMS,)**

Defendants, and)

**KINETIC FUNDS I, LLC,)
KCL SERVICES, LLC d/b/a LENDACY,)
SCIPIO, LLC,)
LF42, LLC,)
EL MORRO FINANCIAL GROUP, LLC, and)
KIH, INC. f/k/a KINETIC INTERNATIONAL, LLC,)**

Relief Defendants.)

**PLAINTIFF’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE RESPONSES TO DE 183-184**

Plaintiff Securities and Exchange Commission (the “Commission”) respectfully moves for an extension of time to file responses to (1) Defendant Michael Scott Williams’ (“Williams”) Motion to Enforce Plaintiff’s Compliance with Rule 34(b)(2)(E)(i), and (2) Williams’ Motion to Compel Defendant’s First Set of Interrogatories, Interrogatory No. 1, and states as follows:

1. The Commission's responses to Williams' motions are currently due on April 7, 2021.

2. On March 12, 2021, the Commission filed its motion for summary judgment, which contains a detailed recitation of the facts with specific cites to the record [DE 200]. Additionally, on April 1, 2021, the Commission timely served interrogatory answers to the Rule 30(b)(6) deposition topics identified in the Court's March 8, 2021 Order. The parties are continuing their efforts toward resolving the issues in the motions, including that Williams might withdraw one or both of them.¹

3. Therefore, the Commission requests an extension of time through May 6, 2021 to respond to the motions. No party will be prejudiced by the proposed extension. Furthermore, the proposed extension may allow the parties to narrow the issues in dispute and, thus, minimize judicial labor.

WHEREFORE, the Commission respectfully requests an extension of time through May 6, 2021 to file the responses.

¹ The parties were able to resolve Williams' motions to compel at DE 185-186, which have been withdrawn, *see* DE 211-212.

LOCAL RULE 3.01(g) CERTIFICATION

Pursuant to Local Rule 3.01(g), the parties conferred on this motion and counsel for Williams does not oppose the requested relief.

April 6, 2021

Respectfully submitted,

By: */s/ Christine Nestor & Stephanie N. Moot*

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CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on April 6, 2021, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Stephanie N. Moot
Stephanie N. Moot

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