

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HONG KONG YU'EN E-COMMERCE
CO. LIMITED,

Plaintiff,

vs.

THE INDIVIDUALS,
CORPORATIONS, LIMITED
LIABILITY COMPANIES,
PARTNERSHIPS AND
UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A" HERETO,

Defendants.

Case No.: 1:24-cv-12483-EEB-MDW

**(UNOPPOSED) FIRST MOTION OF
DEFENDANT ZEAGOO FOR
EXTENSION OF TIME TO
ANSWER OR PLEAD**

Honorable Elaine E. Bucklo

Magistrate M. David Weisman

Amended Complaint Served:

February 24, 2025

Current Response Due:

March 17, 2025

Proposed New Response Date:

April 16, 2025

Defendant Zeagoo (referred to as Defendant #20 in the Amended Complaint) ("Defendant" or "Zeagoo" hereinafter), by and through its undersigned counsel, hereby moves for an extension of thirty days from March 17, 2025 to respond to the Amended Complaint (D.E. #27), though and including April 16, 2025, and in support thereof state as follows:

- 1) Plaintiff served its Amended Complaint by email on Defendants on February 24, 2025, making the current due date for responding to the Amended Complaint March 17, 2024.
- 2) Defendant has recently retained counsel, and it is necessary to allow

sufficient time for the counsel to gather relevant information, review the facts and applicable laws, in order to prepare a comprehensive responsive response.

- 3) While defense counsel gathers such information, the parties herein are currently exploring settlement.
- 4) Given the issues presented, Zeagoo's counsel requested and the parties agree to a 30-day extension of time, from March 17, 2025, for Zeagoo to respond to the Amended Complaint. There have been no prior extensions of time.
- 5) Good cause exists to grant this motion. Defendant's request for additional time to respond to the Complaint in this motion is not intended to cause undue delay. Moreover, no party will be prejudiced by the relief requested herein.

WHEREFORE, Defendant respectfully requests that the Court grant this motion and extend the time for Defendant to respond to the Complaint for thirty days from March 17, 2025 to respond to the Amendment Complaint (D.E. #27), though and including April 16, 2025, and grant such further relief as the Court deems just and proper.

DATED: March 15, 2025

Respectfully submitted,

By: s/Ivan M. Posey
Ivan M. Posey
(Cal. Bar# 196386)
iposey@leechtishman.com
LEECH TISHMAN NELSON
HARDIMAN
1100 Glendon Avenue, 14th Floor
Los Angeles, CA 90024
Tel: (213) 246-4965
Fax: (424) 738-5080

*Attorneys for Defendant
Zeagoo*

[PROPOSED] ORDER

The Court, having considered the foregoing Court hereby orders that the unopposed motion is GRANTED. Defendant Zeagoo shall have until April 16, 2025 to respond to the Amended Complaint.

SO ORDERED this _____ day of _____ 2025.

Honorable Elaine E. Bucklo
Judge of the Federal District Court