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8 *Counsel for Defendant Schneider Electric SE*

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**

11 Stanislav Arbit,

12 Plaintiff,

13 v.

14 Schneider Electric SE,

15 Defendant.

No. 2:23-cv-00533-SPL

**DEFENDANT'S FIRST MOTION
FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE
RESPOND TO COMPLAINT**

(FIRST REQUEST)

**(EXPEDITED RELIEF
REQUESTED – SEE NOTICE)**

17 Pursuant to LRCiv 7.3, Defendant Schneider Electric SE moves the Court to extend
18 the time by which it must answer, move or otherwise respond to Plaintiff Stanislav Arbit's
19 ("Arbit") Complaint. According to the Return of Service filed by Arbit, Schneider Electric
20 SE was purportedly served on July 7, 2023 (Dkt. 15). Accordingly, the current deadline to
21 respond to the Complaint expires on July 28, 2023. By this motion, Schneider Electric
22 respectfully moves to extend that deadline by 45-days, to September 11, 2023. This is the
23 first extension being sought by Schneider Electric. Arbit does not consent to this request.

24 This extension is necessary and is for good cause because Schneider Electric only
25 recently, on July, 20, 2023, engaged counsel to represent it in this matter. (Strand Decl.,
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1 filed herewith, ¶ 3). Moreover, Schneider Electric believes there are deficiencies in the
2 Complaint and anticipates filing a motion to dismiss on several grounds. The additional
3 time will allow the parties to meet and confer in accordance with the Local Rules and this
4 Court's April 4, 2023 Order (Dkt. 8), and then allow time for either Arbit to file an amended
5 Complaint, or Schneider Electric to respond to the Complaint. Schneider Electric is
6 attempting to schedule a a telephonic meet and confer regarding Schneider Electric's
7 potential motion to dismiss this week. (Strand Decl., ¶ 7 and Ex. A thereto) Accordingly,
8 Schneider Electric respectfully submits that there is good cause for a short extension of 45
9 days for it to respond to the Complaint.
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12 On the day it retained counsel, Schneider Electric expeditiously sought consent for
13 the extension from Arbit by email.¹ On July 21, 2023, Arbit indicated by return email that
14 the request for an extension was declined without explanation. (Strand Decl., ¶ 6).
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16 Accordingly, Schneider Electric respectfully requests that the Court grant its motion
17 to extend the time to respond to the Complaint, until September 11, 2023.
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28 ¹ The email address that Arbit provided on the Complaint does not appear to be a valid email, and counsel forwarded the email to an alternative address on July 21, 2023.

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Respectfully submitted,

Date: July 24, 2023

/s/ John L. Strand
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Counsel for Schneider Electric SE

CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court’s electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Plaintiff who is not a registered participant is being served by first class mail and email at the address below on the date of electronic filing:

Stanislav Arbit
5344 E Diamond Avenue
Mesa, AZ 85206
stanarbit@gmail.com

/s/ John L. Strand
John L. Strand

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Stanislav Arbit,

Plaintiff,

v.
Schneider Electric SE,

Defendant.

No. 2:23-cv-00533-SPL

ORDER

IT IS ORDERED that Defendant's time to respond to the Complaint is extended by 45 (forty-five) days, until September 11, 2023.