

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 15-cv-20782-Martinez-Goodman

DENNIS MONTGOMERY,

Plaintiff,

v.

RISEN, ET AL.

Defendants.

**PLAINTIFF'S SUPPLEMENT TO MOTION FOR EXTENSION OF TIME TO RESET
DISCOVERY DEADLINE**

Plaintiff, Dennis Montgomery, hereby supplements his Motion for Extension of Time to Reset Discovery Deadline which was filed on November 17, 2015 (Docket No. 181), by advising the Court that Plaintiff has been forced to file motions to compel and motions for order to show cause before the U.S. District Court for the Central District of California filed on November 12, 2015 and the U.S. District Court for the Southern District of New York filed on November 12, 2015 with regard to deponents who have relevant, probative, and material information concerning this case. Attached as Exhibits 1 and 2 and incorporated by reference are the memoranda and exhibits filed within these courts. The earliest the Central District of California could set a hearing is December 3, 2015, and the earliest hearing available in the Southern District of New York was on December 1, 2015. Plaintiff has moved expeditiously to enforce the subpoenas but Defendants have worked in concert with deponents to delay the enforcement.

Plaintiff fully expects his motions will be granted, in whole or in part, and that all requested testimony and documents will be received by Plaintiff. Plaintiff wants to put the Court on notice that once these motions are granted Plaintiff will expeditiously obtain the requested

testimony and documents for use at trial as these deponents are located outside the jurisdiction of this Court. To not be able to obtain this testimony, which is of crucial importance, will work great prejudice on Plaintiff.

Dated: November 19, 2015

Respectfully submitted,

/s/ Larry Klayman

Larry Klayman
Klayman Law Firm
FL Bar No. 246220
7050 W Palmetto Park Rd.
Suite 15-287
Boca Raton, FL 33433
(310) 595-0800
leklayman@gmail.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of November, 2015, a true and correct copy of the foregoing was served via email and U.S. Mail upon the following:

Sanford Lewis Bohrer

Brian Toth

Holland & Knight, LLP

Suite 3000

701 Brickell Ave

Miami, FL 33131

Email: sbohrer@hklaw.com

Email: brian.toth@hklaw.com

Laura R. Handman

Micah Ratner

Davis Wright Tremaine LLP

1919 Pennsylvania Ave., N.W., Suite 800

Washington D.C. 20006-3401

Email: laurahandman@dwt.com

Email: MicahRatner@dwt.com

Attorneys for Defendants

/s/ Larry Klayman

Larry Klayman, Esq.