

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

IRA KLEIMAN, as personal representative of  
the estate of David Kleiman, and W&K INFO  
DEFENSE RESEARCH, LLC

plaintiffs,

v.

**Case No. 9:18-cv-80176 (BB/BR)**

CRAIG WRIGHT,

defendant.

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**JOINT MOTION  
FOR A 30-DAY EXTENSION OF ALL DISCOVERY AND  
CASE DEADLINES, AND TRIAL SETTING**

The parties are currently engaged in good faith settlement discussions. To that end, Dr. Wright and Plaintiffs respectfully request a 30-day extension of all discovery and case deadlines to facilitate these discussions. In support of this request, the parties state as follows:

1. The parties have been engaged in extensive settlement negotiations and have reached a non-binding agreement in principle to settle this matter.
2. The parties are continuing to negotiate, finalize all relevant terms, and document the agreement appropriately.
3. In the meantime, however, many important case deadlines are quickly approaching. For example, expert disclosures are due on November 5, 2019, the discovery cutoff is set for December 3, 2019, Dr. Wright's opposition to Judge Reinhart's sanctions order is due on September 24, 2019, and Plaintiffs' motion for attorneys' fees is due on September 20, 2019.
4. Reaching a final binding settlement agreement is in the best interests of both parties, and a 30-day extension of all case deadlines (including the trial setting) would enable both parties to devote their full efforts to that goal.

5. For the foregoing reasons, both parties jointly move for a 30-day extension of all discovery and case deadlines.

6. This motion is brought in good faith and not for the purposes of delay.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), I certify that counsel for the movant has conferred with all parties who may be affected by the relief sought in this motion. All parties agree to the relief sought.

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**CERTIFICATE OF SERVICE**

I certify that on September 17, 2019, I electronically filed this document with the Clerk of the Court using CM/ECF. I also certify that this document is being served today on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF or by U.S. Mail.

/s/ Andres Rivero

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