

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION**

LIGHTING SCIENCE GROUP  
CORPORATION,

Plaintiff.

v.

Case No.: 6:16-CV-00680-RBD-GJK

ENERGY EFFICIENT LIGHTING  
COMPANY LIMITED,

Defendant.

---

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO COMPLAINT AND INCORPORATED MEMORANDUM OF LAW**

Defendant, Energy Efficient Lighting Company Limited (“the **Defendant**”), by and through undersigned counsel, requests an Order granting the Defendant an extension of time until October 17, 2016 in order to file its response to the Second Amended Complaint (Doc. #23).

In support of this Motion, the Defendant states:

1. On August 24, 2016, the Plaintiff, Lighting Science Group Corporation (the “**Plaintiff**”), filed its Second Amended Complaint against the Defendant (Doc. #23)(“the **Complaint**”).

2. On August 26, 2016, the Defendant was served with the Summons and the Complaint. Pursuant to applicable law, the Defendant’s response to the Complaint is currently due on September 16, 2016.

3. By the filing of this Motion, the Defendant hereby requests a thirty (30) day extension of time (i.e., until on or before October 17, 2016) to file its response to the Complaint.

Good cause exists for the Court to grant the requested extension of time. Counsel for Defendant and counsel for Plaintiff wish to explore possible settlement of the dispute, potentially obviating the need for the parties and the Court to expend further resources.

4. Pursuant to Local Rule 3.01(g), undersigned counsel certifies that counsel for the Defendant, namely, Felix J. Gilman, has conferred with counsel for Plaintiff concerning the relief requested by Defendant in this Motion. Counsel for Plaintiff does not oppose the relief requested herein.

#### **Memorandum of Law**

Pursuant to Local Rule 3.01(a), the Defendant submits this Memorandum of Law in support of its *Unopposed Motion for Extension of Time to Respond to Complaint*. The applicable rules of procedure permit this Court, in its discretion, to enlarge a period of time “for good cause” when a request is made prior to the expiration of time originally allowed. *See* Fed. R. Civ. P. 6(b)(1). The foregoing allegations constitute such good cause, and would justify the exercise of the Court’s discretion to grant this unopposed motion.

WHEREFORE, the Defendant requests an Order granting the Defendant an extension of time up to and including October 17, 2016<sup>1</sup> in order to file its response to the Second Amended Complaint (Doc. #23), or awarding any other relief deemed just and proper.

Date: September 16, 2016.

Respectfully submitted,

EWUSIAK LAW, P.A.

/s/ Joel Ewusiak

---

<sup>1</sup> Thirty (30) days after September 16, 2016 is Sunday, October 16, 2016. Monday, October 17, 2016 is the next business day.

**Joel Ewusiak**

Fla. Bar No.: 0509361

6601 Memorial Highway, Suite 311

Tampa, FL 33615

P: 727.286.3559

F: 727.286.3219

E: joel@ewusiaklaw.com

*Counsel for Defendant, Energy Efficient Lighting  
Company Limited*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on September 16, 2016, the foregoing document was electronically filed using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Joel Ewusiak

**Joel Ewusiak**