



UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

US DOMINION, INC., DOMINION
VOTING SYSTEMS, INC., and
DOMINION VOTING SYSTEMS
CORPORATION
c/o Cogency Global
1025 Vermont Ave, NW, Ste. 1130
Washington, DC 20005

Plaintiffs,

v.

RUDOLPH W. GIULIANI
[REDACTED]

Defendant,

Civil Action No. 1:21-cv-00213-CJN

Jury Demanded

US DISTRICT COURT
DISTRICT OF COLUMBIA
CLERK
MAR 11 - 3 PM 2021

**DEFENDANT'S UNOPPOSED MOTION
TO EXTEND TIME TO RESPOND TO PLAINTIFFS' ORIGINAL COMPLAINT**

Pursuant to FED. R. CIV. P. 6(b) and without waiving any defenses under FED. R. CIV. P. 12 (other than service of process), Defendant Rudolph W. Giuliani ("Defendant") hereby files his Unopposed Motion to Extend Time to Respond to Plaintiffs' Original Complaint ("Complaint") [Doc. 1], and would respectfully show the Court as follows:

I. GROUNDS FOR MOTION

1. Plaintiffs commenced this action on January 25, 2021, filing a 107-page Complaint with over 150 exhibits. *See generally* Doc. 1.
2. Defendant was served on February 10, 2021. *See* Doc. 8.
3. Defendant's current deadline to respond to the Complaint is March 3, 2021. *See id.*
4. Because the Complaint is voluminous and complex and because Defendant has recently engaged counsel who is awaiting admission in the District for the District of Columbia,

Defendant requires additional time to answer or otherwise respond to the Complaint until April 7, 2021.

5. This is Defendant's first request for an extension of time to respond to the Complaint and the time for answering or otherwise responding to the Complaint has not yet expired.
6. Plaintiffs do not oppose this Motion.
7. This Motion is not made for purposes of delay, but so that Defendant and his counsel can properly and adequately respond to the Complaint.

II. PRAYER

Defendant respectfully requests that this Court extend Defendant's time to answer or otherwise respond to the Complaint up to and until April 7, 2021 in accordance with the proposed order filed concurrently herewith.

Respectfully Submitted,

Rudolph Giuliani
Rudolph W. Giuliani

DEFENDANT *PRO SE*
(Counsel's Admission to D.D.C. pending)

CERTIFICATE OF CONFERENCE

I certify that my counsel conferred with counsel for Plaintiffs, Tom Clare, via email on February 26, 2021 and Plaintiffs are unopposed to this Motion.

Rudolph Giuliani
Rudolph W. Giuliani



CERTIFICATE OF SERVICE

I certify that the foregoing document was served via U.S. Mail on March 3, 2021 to:

Thomas A. Clare, P.C. (D.C. Bar No. 461964)
Megan L. Meier (D.C. Bar No. 985553)
Dustin A. Pusch (D.C. Bar No. 1015069)

10 Prince Street
Alexandria, VA 22314

Rudolph Giuliani
Rudolph W. Giuliani

