

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

TROPICAL CHILL CORP. *et al.*

Plaintiffs,

v.

HON. PEDRO R. PIERLUISI URRUTIA *et al.*

Defendant.

Civil No. 21-1411 (RAM/MEL)

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE IN OPPOSITION TO PLAINTIFFS'
OBJECTION TO REPORT AND RECOMMENDATION

TO THE HONORABLE COURT:

COMES NOW, the Department of Justice of Puerto Rico (hereinafter "DOJPR"), on behalf Defendants, without waiving any right or defense arising from Title III of *Puerto Rico Oversight, Management and Economic Stability Act* ("PROMESA"), 48 U.S.C. §§2101 *et seq.*, the Commonwealth's Petition under said Title or under this case, without submitting to the Court's jurisdiction, and through the undersigned attorney, very respectfully STATES and PRAYS as follows:

1. On January 17, 2022, the Hon. Magistrate Judge Marcos E. López entered the Report and Recommendation on Plaintiffs' Motion for Preliminary Injunction. The document,

recommending that the motion for preliminary injunction be denied, consists of sixty-two (62) pages. [Docket No. 103].

2. Plaintiffs' Objection to the Report and Recommendation was due on January 31, 2022. [Docket No. 103].

3. On January 31, 2022, Plaintiffs requested an extension of time until February 11, 2022, to file their Objection to the Report and Recommendation. [Docket No. 105]. Plaintiffs' request for extension of time was granted. [Docket No. 110].

4. On February 11, 2022, Plaintiffs filed their Objection to the Report and Recommendation, which consists of sixty-eight (68) pages. [Docket No. 114].

5. On February 17, 2022, Plaintiffs filed two documents to amend exhibits that were filed with their Objection to the Report and Recommendation, [Docket No. 115]. On February 22, 2022, the Honorable Court allowed said substitution, [Docket No. 116].

6. Even though the undersigned has been diligently working in Defendants' response in opposition to Plaintiffs' Objection to the Report and Recommendation, which is lengthier than the Report and Recommendation itself, in order to properly address Plaintiffs' arguments raised in their Objection to the Report and Recommendation and the additional evidence filed on a later date, the appearing respondents respectfully request an extension of thirty (30) calendar days, that is, until March 28, 2022, to file Defendants' Response in Opposition to Plaintiffs' Objection to Report and Recommendation.

7. This request is made in good faith and will not cause undue prejudice to the Plaintiffs, since they requested and extension of time to file their Objection to the Report and Recommendation, without any objection from Defendants.

WHEREFORE, it is respectfully requested from this Honorable Court to grant the appearing defendants until March 28, 2022, to file Defendants' Response in Opposition to Plaintiffs' Objection to Report and Recommendation.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 25th day of February 2022.

DOMINGO EMANUELLI HERNÁNDEZ
Secretary of Justice

SUSANA PEÑAGARÍCANO-BROWN
Deputy Secretary in Charge of Litigation

MARCIA PÉREZ LLAVONA
Director of Legal Affairs
Federal Litigation and Bankruptcy Division

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