

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 1:25-cv-21814

TIFFANY (NJ) LLC,

Plaintiff,

v.

AFFORDABLELUXURYFINDS.COM, et al.

Defendants.

_____/

**DEFENDANT NO.36 NA WANG'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER**

Defendant, Na Wang, who is believed to be Defendant 36, by and through its undersigned counsel, respectfully moves this Honorable Court for a 30-day extension of time, up to and including October 23, 2025, to answer or otherwise plead in response to the Complaint. In support of this motion, Defendant states as follows:

1. Defendant's deadline to file an answer was due on September 23, 2025.
2. Defendant has conferred with Plaintiff Counsel, and Plaintiff's Counsel consented to a 30-day extension.
3. However, the filing of appearance and extension was delayed for 7 days because it took Defendant's counsel additional time to confirm the correct corresponding Defendant for the information listed on the Exhibit for Defendant No. 36.
4. Good cause exists for this Court to grant this unopposed extension. This motion has been filed in good faith, will not prejudice any party, and aims to preserve judicial resources without causing unnecessary delay.

WHEREFORE, Defendant respectfully requests that this Court grant a 30-day extension for Defendant to answer or otherwise plead by September 30, 2025.

Dated: September 30, 2025

Respectfully submitted,

/s/ Ni Xue

Ni Xue, Esq.

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Attorney for Defendant

**CERTIFICATE OF GOOD FAITH CONFERENCE; CONFERRED BUT UNABLE TO
RESOLVE ISSUES PRESENTED IN THE MOTION**

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that Defendant has conferred with Plaintiff's Counsel on September 22, 2025, as to extension sought in this motion in a good faith effort to resolve the issues and Plaintiff's counsel has expressed that it agreed to the extension of 30-day to answer sought in the motion on September 30, 2025.

/s/ Ni Xue
Ni Xue, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on Sep 30, 2025, I caused a true and correct copy of the foregoing to be filed on the Court's CM/ECF system, which served notice on all counsel of record.

By: /s/ Ni Xue
Ni Xue