

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

CASE NO. 1:25-cv-21814-JB

TIFFANY (NJ) LLC,

Plaintiff,

v.

**THE INDIVIDUALS, BUSINESS ENTITIES
AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A**

Defendants.

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

Defendant, Na Wang, who is believed to be Defendant No.36 (“Defendant”), 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 on September 23, 2025, and Plaintiff’s Counsel consented to a 30-day extension on the same day.
3. However, the filing of Defendant’s appearance and Motion for Extension was delayed 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. A 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 October 23, 2025.

Date: October 2, 2025

Respectfully submitted,

/s/ Ni Xue

Ni Xue
KEMET LAW GROUP, LLC
1825 NW Corporate Blvd., Ste. 110
Boca Raton, Florida 33431
Telephone: (561) 870-0605
Email: Ni@Kemetlawgroup.com

Attorney for Defendant No.36

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Local Rule 7.1(a)(3)(A), I hereby certify that Defendant has conferred with Plaintiff's Counsel on September 23, 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 23, 2025.

/s/ Ni Xue

Ni Xue

CERTIFICATE OF SERVICE

I hereby certify that on Oct 2, 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.

/s/ Ni Xue

Ni Xue