

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

IRA KLEIMAN, as the personal representative of the  
Estate of David Kleiman, and W&K Info Defense  
Research, LLC

Plaintiffs,

v.

CRAIG WRIGHT,

Defendant.

CASE NO.: 9:18-cv-80176-BB/BR

**MOTION FOR BRIEF EXTENSION OF TIME  
TO FILE A MOTION FOR SANCTIONS**

Plaintiffs Ira Kleiman, as the personal representative of the Estate of David Kleiman, and W&K Info Defense Research, LLC (“Plaintiffs”), pursuant to Fed. R. Civ. 6(b), hereby file this Motion for Brief Extension of Time to File a Motion for Sanctions.

1. Under the operative scheduling order [ECF No. 441], all pre-trial motions, motions in limine, *Daubert* motions, and dispositive motions are due Friday, May 8, 2020.

2. Plaintiffs intend to file a sanctions motion based on Defendant’s conduct in these proceedings. This motion will include, but not be limited to, the Defendant’s provision of a false notice and false list of bitcoin addresses in response to this Court’s order allowing him “through and including February 3, 2020, to file a notice with the Court indicating whether or not this mysterious figure has appeared from the shadows and whether the Defendant now has access to the last key slice needed to unlock the encrypted file.” ECF No. [373], at 22. While it is unclear whether such a motion constitutes a pre-trial motion that must be filed by May 8th, in an abundance of caution, and for good cause shown, Plaintiffs request a brief ten (10) day extension of time to file said motion.

3. Under Federal Rule of Civil Procedure 6(b), good cause exists for an extension because preparing the sanctions motion will be extremely difficult in light of the substantial other briefing due to the Court on May 8th. To that end, Plaintiffs' counsel is working diligently to prepare several motions in limine, motions to strike experts, *Daubert* motions, and dispositive summary judgment motions prior to this Friday's deadline.

4. Adding to this difficulty is the fact that 13 depositions, including 11 expert depositions, were conducted over the last two weeks and a number transcripts needed for preparation of the above-mentioned motions did not become available until today (with some still not delivered). Further adding complexity is that counsels' offices remain closed due to COVID-19 and counsel's children remain home from school.

5. This request will not affect the trial setting, or any other deadline in this action.

6. Further, the Defendant will not be prejudiced by the relief requested, which is not being sought for the purpose of delay.

7. For the forgoing reasons, Plaintiffs request a 10-day extension of time to file their sanctions motion, up to and including May 18, 2020.

**S.D. FLA. L.R. 7.1 CERTIFICATION**

Pursuant to S.D. Fla. L.R. 7.1(a)(3), counsel for Plaintiffs conferred with counsel for Defendant and Defendant opposes the relief requested by Plaintiffs.

Dated: May 5, 2020

Respectfully submitted,

/s/ Velvel Freedman

Velvel (Devin) Freedman, Esq.

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*Counsel to Plaintiff Ira Kleiman as Personal  
Representative of the Estate of David Kleiman  
and W&K Info Defense Research, LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 5, 2020, a true and correct copy of the foregoing was served via e-mail on all counsel of record

/s/ Velvel (Devin) Freedman

Velvel (Devin) Freedman