

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LISA AUDIT,

Plaintiff,

v.

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No.: 1:25-cv-13562

Judge Robert W. Gettleman

Magistrate Judge Jeffrey T. Gilbert

**PLAINTIFF’S MOTION FOR AN EXTENSION OF TIME TO FILE
SUPPLEMENTAL DEFAULT MEMORANDUM**

Plaintiff, LISA AUDIT (“Plaintiff”), respectfully moves this Court for an extension of time, until July 13, 2026, to file the supplemental memorandum required by this Court’s Order [32], and as extended by Orders [37] and [43].

On January 20, 2026, this Court entered an Order [32] directing Plaintiff to file a supplemental memorandum addressing (1) whether the addresses of Defaulting Defendants are known, and (2) if not, the efforts Plaintiff undertook to discover those addresses. The Court subsequently granted Plaintiff’s prior requests for extensions of that deadline, first through April 23, 2026 [37], then through June 22, 2026. [43]. Plaintiff respectfully requests an additional 21 days to file the supplemental default memorandum, as Plaintiff is waiting for further information from her investigators in China regarding Defendants’ addresses to ensure that the analysis remains consistent with the most recent cases. This information is necessary to fully respond to the Court’s inquiry in the supplemental memorandum and the forthcoming motion for default judgment.

Rule 6(b)(1)(A) once again permits the Court to extend a deadline for good cause on a motion made before the original time expires. Good cause exists here. The supplemental default

memorandum and the forthcoming default judgment motion turn in significant part on the results from Plaintiff's investigators, located in China, and their efforts researching Defendants' addresses. Plaintiff expects to obtain that information shortly and will need additional time to review and analyze the investigators' findings. The 21-day extension is narrowly tailored to the time required to complete that work. No Defendant has appeared, and no party will be prejudiced by the requested extension.

For the foregoing reasons, Plaintiff respectfully requests that this Court enter an Order extending the deadline to file the supplemental memorandum required by this Court's Order [32] up to and including July 13, 2026.

DATED: June 22, 2026

Respectfully submitted,

/s/ Keith A. Vogt

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 22, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send an email notification of such filing to all registered attorneys of record.

/s/ Keith A. Vogt

Keith A. Vogt, Esq.