

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

[Redacted]

Plaintiffs,

v.

[Redacted],

[Redacted]

and

[Redacted]

Defendants.

**Notice of Motion for
Extension of Time to
Serve and File Opposition
Papers and for Related
Adjournment.**

Notice of Motion

Please take notice that upon the accompanying papers filed in support of this motion, and upon all prior pleadings and proceedings in this action, Plaintiffs, appearing pro se, will move this Court at the Supreme Court of the State of New York, County of New York, located at 60 Centre Street, New York, New York 10007, in the Motion Submission Part, Courtroom 130, on March 5, 2026, at 9:30 a.m., or as soon thereafter as counsel and the Court may be heard, for an Order pursuant to CPLR 2004 and CPLR 2214(b):

- a. Extending Plaintiffs' time to serve and file opposition papers to Defendants' Motion to Dismiss **up to and including March 3, 2026**; and
 - I. Adjourning the **March 5, 2026** return date of Defendants' Motion to Dismiss, as necessary, to accommodate the extended briefing schedule and permit Defendants a fair opportunity to submit reply papers, if any; and
 - II. Granting such other and further relief as the Court deems just and proper.

Grounds for the Motion (Good Cause)

This motion is made on the following grounds, which Plaintiffs respectfully submit constitute good cause within the meaning of CPLR 2004:

Defendants filed a Motion to Dismiss on February 17, 2026, with a stated return date of March 5, 2026.

1. Pursuant to CPLR 2214(b), where a motion is noticed to be heard on a particular date, opposition papers are due seven (7) days prior to the return date, making Plaintiffs' opposition due on February 26, 2026.

2. Defendants' Motion to Dismiss is brought pursuant to CPLR 3211(a)(1), CPLR 3211(a)(7), and CPLR 3211(g).
3. The invocation of CPLR 3211(g) (Anti-SLAPP) imposes heightened burdens at the pleading stage, requiring Plaintiffs to address a more demanding legal framework than would apply on an ordinary CPLR 3211(a)(7) motion.
4. The Motion to Dismiss raises multiple complex and interrelated legal doctrines, including standards under the Anti-SLAPP statute, absolute litigation privilege, Judiciary Law § 487, defamation principles, abuse of process, fraud, tortious interference, and other substantive theories.
 - i. The Motion to Dismiss challenges numerous causes of action in a comprehensive and multi-faceted manner, requiring Plaintiffs to prepare a correspondingly careful and organized response.
 - ii. The Motion to Dismiss is brought on behalf of a law firm and forty-two (42) individual attorney defendants, and addresses issues as to multiple categories of defendants.
 - iii. The Motion to Dismiss contains extensive legal authority requiring substantial review, research, and analysis by Plaintiffs, including numerous case citations and statutory authorities.
 - iv. Plaintiffs are appearing without counsel and therefore bear the full responsibility for legal research, drafting, document preparation, and compliance with procedural rules applicable to motion practice in this Court.
 - v. As pro se litigants, Plaintiffs must independently review and analyze the legal authorities cited in Defendants' motion papers, prepare and organize all

materials necessary for opposition, ensure compliance with the CPLR and applicable court rules, and undertake consultation with an attorney as needed.

- vi. The extension requested is modest-extending the current deadline by approximately five (5) days-and is limited to a specific date certain: March 3, 2026.
- vii. Plaintiffs make this request in good faith and not for purposes of delay.
- viii. No prejudice will result to Defendants from this brief extension and any corresponding adjournment necessary to accommodate a fair briefing schedule.

Relief Requested

Plaintiffs respectfully request that the Court grant the relief set forth in the Notice of Motion above, including (i) an extension of time to serve and file opposition papers through and including March 3, 2026, and (ii) such adjournment of the March 5, 2026 return date as the Court deems necessary to accommodate the extended schedule.

Dated: New York, New York

February 20, 2026

Respectfully submitted,



To:

Attorne

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