IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ASHER BRONSTIN, individually and on behalf of all other similarly situated, Plaintiff, v. VIASAT, INC., and THE PREFERRED PREPAID, INC. d/b/a XYZies Defendants.	Civil Action No. 1:25-cv-00927-KMN (Hon. Keli M. Neary)

UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS TO FILE RESPONSE TO SECOND AMENDED COMPLAINT

Defendants Viasat, Inc. ("Viasat") and The Preferred Prepaid, Inc. d/b/a XYZies ("XYZies"), collectively ("Defendants") respectfully submit this **unopposed** motion to extend the time by which Defendants must submit a response to Plaintiff's Second Amended Complaint (*see* Dkt. 70, "SAC"), to August 12, 2026. In support thereof, Defendants states the following:

1. Plaintiff filed his SAC in this action on June 11, 2026. *See* Dkt. 70.

2. On June 18, 2026, the Court ordered that Viasat's deadline to respond to the SAC shall be extended to the same deadline applicable to XYZies following service, so that both defendants may respond on the same schedule. *See* Dkt. 723.

3. On June 27, 2026, XYZies was served with a copy of the SAC.

4. According to the Federal Rules of Civil Procedure 12 and 15, XYZies deadline to respond to the SAC is July 20, 2026.

5. On July 14, 2026, XYZies counsel, Joe Samo, requested an extension of XYZies

response deadline to August 12, 2026.[1]

6. Plaintiff's counsel agreed to extend XYZies and Viasat's deadline to respond to the SAC to August 12, 2026.

7. Pursuant to the requested and agreed to extension, if granted, Defendant's new deadline to answer, move or otherwise respond to the SAC would be August 12, 2026.

8. This is the Defendants' first request for an extension of this deadline.

9. No other case deadlines will be impacted by the requested extension.

10. This motion is made in good faith and not for the purpose of delay.

11. No party to this action will be unduly prejudiced by the granting of the requested extension of time, especially as the parties are in agreement. An extension will not impact the timely resolution of this matter, or any other deadlines, as this case is still in its early stages.

12. Thus, Defendants respectfully submits that there is sufficient "good cause" to grant the requested extension, for at least the reasons provided above.

WHEREFORE, for all of the reasons above, Defendants respectfully request that the Court enter an order extending its deadline to answer, move or otherwise respond to the SAC would be August 12, 2026. A proposed order has been included for the Court's consideration.

Dated: July 16, 2026 Respectfully submitted,

By: */s/ A. Paul Heeringa*

(Admitted *Pro Hac Vice*)
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[1] Although Mr. Samo has not formally entered an appearance in this matter he has agreed to allow his signature on this motion.

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By: */s/ Joe Samo*

Counsel for Defendant XYZies

CERTIFICATE OF SERVICE

I hereby certify that, on July 16, 2026, I filed the foregoing electronically through the Court's CM/ECF system, which caused the following parties or counsel to be served by electronic means on all parties and their respective counsel of record.

/s/ A. Paul Heeringa