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March 19, 2026

**VIA ECF AND EMAIL**

Judge Katherine Polk Failla  
c/o Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-13  
Email: Failla\_NYSDChambers@nysd.uscourts.gov

**Re: 1:26-cv-02059, *Lolcow, LLC v. Zhen Elizabeth Fong Jones*, Motion for Extension of Time**

Dear Judge Failla:

Undersigned counsel for Defendant Zhen Elizabeth Fong-Jones respectfully submits this Letter-Motion, on consent, pursuant to Local Civil Rule 7.1(d) and Your Honor's Individual Practices § I.e., requesting a brief extension of time for Defendant to answer, move, or otherwise respond to the Complaint in the above-captioned action.

**1. Original Deadline**

On March 12, 2026, Plaintiff's counsel sent Defendant a request for waiver of service of summons pursuant to Federal Rule of Civil Procedure 4(d). Defendant returned the executed waiver on March 18, 2026. Because Defendant was located outside any judicial district of the United States at the time the waiver request was sent, Defendant's deadline to respond is ninety (90) days from March 12, 2026—i.e., June 10, 2026—pursuant to Rule 4(d)(3).

**2. Number of Previous Requests**

This is the first request for an extension of time to respond to the Complaint. No prior requests have been made or denied.

**3. Reason for the Request**

Scheduling conflicts affecting both undersigned counsel and Defendant necessitate a brief extension of the response deadline. The parties request a twelve-day extension, to and including June 22, 2026.

**4. Consent**

March 19, 2026

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All parties consent to this request. A Stipulation and Proposed Order executed by counsel for both parties is attached hereto as Exhibit A.

The requested extension will not prejudice any party or delay the progress of this action.

For the foregoing reasons, the parties respectfully request that the Court so-order the attached Stipulation extending Defendant's time to answer, move, or otherwise respond to the Complaint to and including June 22, 2026..

Sincerely

KAMERMAN, UNCYK, SONIKER &  
KLEIN P.C.

By: */s/ Lane A. Haygood*\_\_\_\_\_

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

LOLCOW, LLC,

Plaintiff,

v.

Civil Action No. 1:26-cv-02059

ZHEN ELIZABETH FONG-JONES,

Defendant.

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**STIPULATION AND PROPOSED ORDER**  
**EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND**

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for Plaintiff Lolcow, LLC and counsel for Defendant Zhen Elizabeth Fong-Jones, as follows:

1. Plaintiff commenced this action by filing a Complaint on or about March 12, 2026. On March 12, 2026, Plaintiff's counsel sent to Defendant's counsel a request for waiver of service of summons pursuant to Federal Rule of Civil Procedure 4(d). Defendant, through counsel, returned the executed Waiver of the Service of Summons on March 19, 2026.
2. Because Defendant was located outside any judicial district of the United States at the time the waiver request was sent, Defendant's time to serve an answer or file a motion under Rule 12 of the Federal Rules of Civil Procedure is ninety (90) days from March 12, 2026, i.e., June 10, 2026, pursuant to Rule 4(d)(3).
3. Due to scheduling conflicts affecting both defense counsel and Defendant, the defense respectfully request that the deadline for Defendant to answer, move, or otherwise respond to the Complaint be extended by twelve (12) days, from June 10, 2026 to and including **June 22, 2026**. Plaintiff does not object.
4. This is the first request for an extension of time to respond to the Complaint. No prior requests for an extension have been made or denied.
5. Plaintiff will withdraw ECF 6, a request for alternative service.
6. The requested extension will not prejudice any party or unduly delay this action.
7. This stipulation is made pursuant to Federal Rule of Civil Procedure 29 and is submitted for a so-ordering by the Court.

Respectfully submitted,

**FOR DEFENDANT:**



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**Lane A. Haygood**  
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*Counsel for Defendant*

**FOR PLAINTIFF:**



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*Counsel for Plaintiff*

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**SO ORDERED:**

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United States District Judge

Dated: \_\_\_\_\_  
New York, New York