IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF IOWA CENTRAL DIVISION

CHRIST APOSTOLIC TEMPLE, INC., DWIGHT REED, and JORDAN REED,

Plaintiffs,

VS.

DEMETRIUS SINEGAL, THE KINGDOM CHURCH, and SAFEHOUSE #UNMUZZLED,

Defendants.

No. 4:22-cv-00303-JEG-HCA

MOTION FOR EXTENSION OF TIME TO FILE AN ANSWER

NOW COME the Defendants, Demetrius Sinegal, The Kingdom Church, Inc. and Safehouse #Unmuzzled, through their attorney Amanda T. Adams, pursuant to Federal Rule of Civil Procedure 6, and in support of this Motion for Extension of Time to File an Answer, state as follows:

- 1. The original answer was due on September 19, 2022, when Attorney Adams unexpectedly departed her previous firm, O'Flaherty Law P.C. The Defendant notified Ms. Adams that they were unsure they wanted her to continue representation at that point, so Ms. Adams did not wish to take any unauthorized action on behalf of her clients while they decided what to do with continued representation.
- Ms. Adams filed a Motion for Extension of Time to File An Answer and Supplemental Jurisdictional Statement, and the Court granted the Defendants until October 28, 2022, to file a Supplemental Jurisdictional Statement.
- The Defendants, two corporate bodies and one individual, have now agreed they want
 Ms. Adams to continue representing them.
- 4. The Court did not address the request for extension of time to file an answer, but did

not deny it.

5. James Quilty, opposing counsel, the attorney for Plaintiffs, has spoken to Attorney

Adams and says his concern is an objection to federal jurisdiction, but he says he does

not object to an extension of time to file the Defendants' answer.

6. The Defendants filed their Supplemental Jurisdictional Statement today.

7. Because of the extended deadline to file a supplemental jurisdictional statement, there

is no prejudice to either party with defendants being given additional time to file an

answer, and the proposed answer is attached hereto and made a part hereof as

"Exhibit A."

WHEREFORE, the Defendants respectfully request that this Honorable Court allow them

to file the attached answer instanter, and for such further, other, or different relief as this

Honorable Court deems appropriate, reasonable, and just.

Respectfully submitted,

/s/ Amanda T. Adams

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