

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

JOSEPH KIRCHNER, Plaintiff, v. MIKE JOHNSON, <i>et al.</i> , Defendants.	Case No. 1:25-cv-02735-ACR Judge Ana C. Reyes
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**CONSENT MOTION FOR EXTENSION OF TIME FOR
DEFENDANT ANTHROPIC, PBC TO RESPOND TO
PLAINTIFF JOSEPH KIRCHNER’S SECOND AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant Anthropic, PBC (“Anthropic”), with the consent of Plaintiff Joseph Kirchner, respectfully requests an extension of time until April 29, 2026, to respond to Mr. Kirchner’s Second Amended Complaint.

This Court has broad discretion to administer procedural rules to “secure the just, speedy, and inexpensive determination of every action and proceeding.” Fed. R. Civ. P. 1. Before a deadline expires, the Court may extend the deadline for good cause. Fed. R. Civ. P. 6(b)(1)(A).

Mr. Kirchner filed a Second Amended Complaint [ECF 13] on January 19, 2026. On February 12, 2026, the Court entered a minute order directing Mr. Kirchner to “properly serve Defendants in this matter by April 20, 2026.” Anthropic received a copy of the Second Amended Complaint on March 3, 2026. Undersigned counsel was only recently retained by Anthropic. Therefore, without waiving any available defenses, including but not limited to the defenses outlined in Federal Rule of Civil Procedure 12(b), Anthropic respectfully requests additional time to allow undersigned counsel to analyze and respond to the Second Amended Complaint.

Pursuant to Local Civil Rule 7(m) and Paragraph 7(h) of this Court’s Standing Order in Civil Cases, undersigned counsel conferred with Plaintiff Joseph Kirchner by email and telephone before filing this motion. On March 13, 2026, Mr. Kirchner confirmed by telephone

and email that he consented to an extension until April 29, 2026 for Anthropic to respond to his Second Amended Complaint.

Wherefore, Defendant Anthropic, PBC respectfully requests an extension of time until April 29, 2026 to answer or otherwise respond to Plaintiff Joseph Kirchner's Second Amended Complaint.

Dated March 17, 2026

Respectfully Submitted,

/s/ Tara N. Tighe

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CERTIFICATE OF SERVICE

I certify that on March 17, 2026, a true and correct copy of the forgoing document was filed using the Court's electronic case filing system and served by email on *pro se* Plaintiff Joseph Kirchner. In accordance with Local Civil Rule 7(c) and Paragraph 7(e) of this Court's Standing Order in Civil Cases, the accompanying proposed order is also being filed on the docket and submitted to the Court and *pro se* Plaintiff Joseph Kirchner by email.

Respectfully Submitted,

/s/ Tara N. Tighe

Tara N. Tighe | DC Bar No. 1742435