

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT BECKLEY

CASE NO. 5:24-cv-00700

ANNA WHITE FERRARACCIO

Plaintiff

v.

NEW PEOPLE's BANK

Defendant

**PLAINTIFF's MOTION FOR EXTENSION
OF TIME TO RESPOND TO MOTION TO DISMISS AMENDED COMPLAINT**

Plaintiff by and through her undersigned counsel hereby moves this Court for an extension of time to respond to the Motion to Dismiss Amended Complaint in this matter and states as follows:

1. The undersigned has recently appeared in this case.
2. The undersigned is aware that a response to the Motion to Dismiss Amended Complaint has been ordered by June 10, 2025. While the undersigned understands that this has been pending for quite a while based upon the Plaintiff's *pro se* status, the undersigned would like some additional time to formulate a cohesive plan going forward which will likely result in seeking leave to file a Second Amended Complaint. It is the undersigned's hope that a properly drafted Second Amended Complaint and compliance with this Court's scheduling orders will get this matter moving on the right track going forward.
3. Based upon foregoing, the undersigned requests a ten (10) day extension from

June 10, 2025 to respond to the Motion to Dismiss Amended Complaint or seek leave to file a Second Amended Complaint..

4. The undersigned has conferred with opposing counsel who opposes the relief sought herein.

WHEREFORE, the Plaintiff requests an extension of ten (10) days to file a response to the Motion to Dismiss Amended Complaint or seek leave for further amendment and for any other relief this Court deems just and proper under the circumstances.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been e-mailed this 5 day of June 2025: William S. Winfrey, PO Box 1159, Princeton, WV 24740-1159.

Behren Law Firm
1930 N. Commerce Parkway-Suite 4
Weston, FL 33326
(954) 636-3802 - phone
(772) 252-3365 - fax
scott@behrenlaw.com

By:/Scott M. Behren/
Scott M. Behren
Fla Bar No. 987786

/s/ Robert P. Dunlap, II
(WVSB# 10012)
345 Prince Street
Beckley, WV 25801
Ph: (304) 255-4762
Fax: (304) 255-4760
robertdunlapesq@gmail.com