

Motions

[3:25-cv-02308-SB Hollingsworth v. Sanofi-Aventis US LLC et al](#)

U.S. District Court

District of Oregon

Notice of Electronic Filing

The following transaction was entered by Edwards, Bobbi on 1/19/2026 at 6:58 PM PST and filed on 1/19/2026

Case Name: Hollingsworth v. Sanofi-Aventis US LLC et al

Case Number: [3:25-cv-02308-SB](#)

Filer: Steven S. Dickert
AMJ Services LLC

Document Number: [5](#)

Docket Text:

Motion for Extension of Time to Answer *Plaintiff's Complaint*. Expedited Hearing requested. Filed by Steven S. Dickert, AMJ Services LLC. (Edwards, Bobbi)

3:25-cv-02308-SB Notice has been electronically mailed to:

Bobbi J. Edwards bedwards@fisherphillips.com

Stephen M. Scott smscott@fisherphillips.com, cmcclintock@fisherphillips.com

3:25-cv-02308-SB Notice will not be electronically mailed to:

Jorden Hollingsworth
PO Box 16142
Portland, OR 97292

The following document(s) are associated with this transaction:

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Attorneys for Defendants AMJ Services, LLC
 and Steven S. Dickert, in his capacity as Trustee
 of Basil Management Trust

UNITED STATES DISTRICT COURT
 DISTRICT OF OREGON
 PORTLAND DIVISION

JORDEN HOLLINGSWORTH,
 Plaintiff,
 v.
 SANOFI-AVENTIS US; CHATTEM INC.;
 QUTEN RESEARCH INSTITUTE LLC;
 AMJ SERVICES LLC; STEVEN S.
 DICKERT, in his capacity as Trustee of
 BASIL MANAGEMENT TRUST,
 Defendants.

Case No. 3:25-cv-02308-SB

**DEFENDANTS AMJ SERVICES LLC
 AND STEVEN S. DICKERT'S
 MOTION FOR EXTENSION OF TIME
 TO RESPOND TO COMPLAINT**
**EXPEDITED CONSIDERATION
 REQUESTED**

LR 7-1 CERTIFICATION

The undersigned certifies that Counsel for Defendants AMJ Services LLC and Steven S. Dickert, in his capacity as Trustee for Basil Management Trust (collectively, "Defendants"), conferred with Plaintiff by email on January 16, 2026, regarding this Motion

PAGE 1 - DEF. AMJ SERVICES AND STEVEN DICKERT'S
 MOTION FOR EXTENSION OF TIME TO RESPOND TO
 PLAINTIFF'S COMPLAINT

FP 61308093.1

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for Extension of Time to Respond to Plaintiff's Complaint ("MOET"). Plaintiff opposes Defendants' MOET. Declaration of Bobbi Edwards in support of Defendants' MOET ("Edwards Decl."), ¶ 3, Ex. 1.

Expedited consideration of this MOET is requested due to the upcoming deadline for Defendants to file a responsive pleading to Plaintiff's Complaint.

MOTION

Pursuant to Fed. R. Civ. P. 6(b), Defendants move the Court for an extension of time, through and including February 6, 2026, for Defendants to file a responsive pleading to Plaintiff's Complaint.¹

MEMORANDUM

1. PROCEDURAL BACKGROUND

Plaintiff filed his Complaint on December 11, 2025. Defendant AMJ Services was served with summons and complaint on December 31, 2025. Defendant Steven S. Dickert, in his capacity as Trustee for Basil Management Trust, was allegedly served on January 3, 2026. Based on the affidavit of service and facts known at this time, service for Defendant Steven S. Dickert may have been improper under the Federal Rules of Civil Procedure and Utah Rules of Civil Procedure. Without conceding any defense, assuming service was proper, then AMJ Services' response is due January 21, 2026, and Mr. Dickert's response is due January 23, 2026.

Defendants retained Fisher & Phillips on January 16, 2026 to represent them in relation to the Complaint.

¹ Defendants are filing this MOET without waiving their right to assert any affirmative defenses such as lack of jurisdiction, statute of limitations, preemption, waiver, and failure to state a claim.

2. ARGUMENT

In accordance with Fed. R. Civ. P. 6(b)(1)(A), a case schedule may be modified for “good cause.” “Good cause is a non-rigorous standard that has been construed broadly across procedural and statutory contexts.” *Zawacky v. Cnty. of Clark*, No. 3:22-CV-05101-DGE, 2023 WL 34596, at *2 (W.D. Wash. Jan. 4, 2023) (quoting *Ahanchian v. Xenon Pictures, Inc.*, 624 F.3d 1253, 1259 (9th Cir. 2010) (internal quotation marks omitted)). “Requests for extensions of time made prior to the deadline at issue should typically be granted absent bad faith by the moving party.” *Id.* Defendants seek this extension to allow time to prepare their response to the Complaint. Due to the recent retention of counsel, this extension is sought in good faith and not for purposes of delay.

This MOET is not made for any improper purposes or to cause undue delay, and no prejudice to Plaintiff would result from granting Defendants’ MOET. This is the first request for an extension of time made by Defendants.

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CONCLUSION

For the reasons outlined above, Defendants respectfully move the Court for an Order extending the deadline for Defendants to respond to Plaintiff's Complaint to February 6, 2026.

DATED this 19th day of January, 2026.

FISHER & PHILLIPS LLP

s/ Bobbi J. Edwards

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Attorneys for Defendants AMJ Services
LLC and Steven S. Dickert, in his capacity
as Trustee for Basil Management Trust

CERTIFICATE OF SERVICE

I hereby certify that on the date written below, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

I further certify that I caused the foregoing document to be served on following non-CM/ECF participant by the following method(s) below:

Jorden Hollingsworth
15919 SE McLoughlin Blvd., Unit 4
Portland, OR 97267

- First-Class Mail on 01/20/2026**
- Email (courtesy only) on 01/19/2026**
jordentimothy11@gmail.com

Petitioner Pro Se

DATED this 19th day of January 2026.

FISHER & PHILLIPS LLP

s/ Bobbi J. Edwards
Bobbi J. Edwards, OSB No. 211574

Attorneys for Defendants AMJ Services LLC and Steven S. Dickert, in his capacity as Trustee of Basil Management Trust