

April 14, 2025

1 Michael Williams
2 PRO SE

3
4 **IN THE UNITED STATES DISTRICT COURT**
5 **FOR THE DISTRICT OF COLUMBIA**

6 **History Associates Incorporated;**

7 Plaintiff;

8 And

9 **Michael Williams;**

10 Plaintiff-Intervenor;

11 v.

12 **Federal Deposit Insurance Corporation;**

13 Defendant.
14
15

Case No. 1:24-cv-1857-ACR

**PLAINTIFF-INTERVENOR'S MOTION TO
EXTEND TIME TO FILE MOTION FOR RELIEF**

16 **MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR RELIEF**

17 Pursuant to Federal Rule of Civil Procedure 6(b), Pro Se Movant Mr. Williams respectfully
18 moves the Court for an order extending his deadline to file any motions for relief until at least
19 fourteen (14) days from today (or until April 28, 2025).
20

21 In support of this request, Mr. Williams states as follows:

22 **I. BACKGROUND**

23 Mr. Williams is a self-represented litigant with no legal training who has been named as a
24 non-party respondent in an order in this action and intends to promptly challenge the Court's
25 jurisdiction over him, including an invalid order made at docket entry thirty (#30) (the "**Order**").¹
26

27 ¹ At the onset, Mr. Williams denies ever sending any text messages to any FDIC attorney listed as
28 counsel of record for this case and asserts that Mr Andrew Dober made these messages up, caused

April 14, 2025

1 The “deadline” for Mr. Williams to file a motion for relief to the Order is April 14, 2025, which is
2 in less than an hour.²

3 4 II. ARGUMENT

5 Federal Rule of Civil Procedure 6(b) allows the Court to extend deadlines for good cause.
6 Here, good cause exists because Mr. Williams encountered technical difficulties, namely, the 45+
7 page memorandum in support of the motion became corrupt, and he had to revert to a backup, losing
8 at least two weeks of work. Mr. Williams worked tirelessly through the last three (3) days, hoping
9 to make up for the work he had done in two weeks in three days; however, despite his best efforts,
10 he could not do so.
11

12 Mr. Williams’s request for an extension will not prejudice any other party. Despite arguing
13 that the order is invalid, Mr. Williams has followed the Court’s order stringently. Allowing Mr.
14 Williams the necessary time to restore his motion to its original complete form will promote fairness
15 and judicial efficiency and enable the Court to reach a sound judicial conclusion. Moreover, the
16 FDIC, the only party likely to oppose Mr. Williams’ motion to remove the protective order, is
17 presently busy responding to HAI’s amended complaint for which they asked and received an
18 agreed-upon extension of time.
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25 _____
26 them to be made up, or was intentionally or recklessly negligent into investigating the actual source
27 of these messages.

28 ² Mr. Williams maintains an order entered without jurisdiction can be challenged at any time, and
should he not challenge the order by the Court’s self-imposed deadline, he does not waive any
rights to challenge the order, directly or collaterally, or any purported contempt of such an order in
the future.

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III. CONCLUSION

A proposed order is attached hereto in compliance with **LCvR 7(c)**. Due to time constraints, Mr. Williams has been unable to meet and confer with parties on either side in relation to this motion for an extension of time.

WHEREFORE, Mr. Williams respectfully prays that the Court grant Mr. Williams an extension of time to file any related motions for relief until at least fourteen (14) days from today (or until April 28, 2025).

Dated: April 14, 2025

Respectfully submitted,

/s/ Michael Williams

Michael Williams

PRO SE

April 14, 2025

Michael Williams
PRO SE

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Plaintiff;

And

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**PLAINTIFF-INTERVENOR'S CERTIFICATE OF
SERVICE FOR MOTION TO EXTEND TIME**

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2025, a true and correct copy of Mr. Williams's Motion to Extend Time was served, via CM/ECF, upon the following Counsel for Plaintiff History Associates Inc.:

- Eugene Scalia of GIBSON, DUNN & CRUTCHER, LLP at <escalia@gibsondunn.com>
- Denis Nicholas Harper of GIBSON, DUNN & CRUTCHER, LLP at
<nharper@gibsondunn.com>
- Jonathan Charles Bond of GIBSON, DUNN & CRUTCHER, LLP at
<jbond@gibsondunn.com>

I further certify that the same day, via CM/ECF, I served a copy upon Counsel for the Defendant, Federal Deposit Insurance Corporation:

- Andrew Jared Dober of Federal Deposit Insurance Corporation at <adober@fdic.gov>

April 14, 2025

- Lina Soni of Federal Deposit Insurance Corporation at <lsoni@fdic.gov>

Dated: April 14, 2025

Respectfully submitted,

/s/ Michael Williams

Michael Williams

PRO SE

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[PROPOSED] ORDER

Upon good cause shown, Mr. Williams' deadline to file a motion for relief is **EXTENDED** to April 28, 2025.

Date

HON. ANA C. REYES
United States District Judge