

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
No. 1:26-cv-00038-DAB-JEP

HEATHER AMMEL,

Plaintiff,

v.

KYRSTEN SINEMA,

Defendant.

**MOTION FOR EXTENSION OF
TIME TO RESPOND TO
PLAINTIFF'S COMPLAINT**

Defendant Kyrsten Sinema ("Defendant"), by and through undersigned counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rule 6.1(a), respectfully submits this Motion for Extension of Time to Respond to Plaintiff's Complaint. In support of this motion, Defendant shows unto the Court the following:

1. Plaintiff filed her Complaint in the Superior Court of Moore County, North Carolina on September 30, 2025.
2. Through counsel, Marcia H. Armstrong, Defendant accepted service of the Summons and Complaint on November 3, 2025.
3. On January 13, 2025, L. Lamar Armstrong, III, filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, and Rule 11 of the Federal Rules of Civil Procedure.
4. Undersigned counsel was retained by Defendant, yesterday, January 15, 2025. Defendant's prior counsel, L. Lamar Armstrong, III, will be moving to withdraw.

5. Pursuant to Fed. R. Civ. P. 81(c)(2)(C), the deadline for Defendant to respond to Plaintiff's Complaint is January 20, 2026, which has not yet passed.

6. Undersigned counsel requires additional time to investigate the factual allegations of the Complaint in order to adequately respond thereto. In addition, there are jurisdictional issues that need to be reviewed and analyzed prior to the filing of responsive pleadings.

7. This motion is made in good faith and not for the purpose of delay.

8. Defendant has not previously requested an extension of time in this matter.

9. Pursuant to Local Rule 6.1(a), Defendant's counsel consulted with Plaintiff's counsel prior to the filing of this motion. Plaintiff consented to Defendant's motion for a 30-day extension of time in which to answer or otherwise respond to the Complaint.

10. WHEREFORE, Defendant respectfully requests that this Court grant a 30-day extension of time in which to respond to Plaintiff's Complaint, up to and including Thursday, February 19, 2026.

Respectfully submitted the 16th day of January 2026.

POYNER SPRUILL LLP

By: /s/ Steven B. Epstein
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*Attorney for Defendant Kyrsten
Sinema*

CERTIFICATE OF SERVICE

I certify that I have this day electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all counsel and parties of record.

This the 16th day of January 2026.

/s/ Steven B. Epstein
Steven B. Epstein

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**ORDER GRANTING
DEFENDANT'S MOTION FOR
EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

This cause came to be heard upon the Defendant Kyrsten Sinema's Motion for Extension of Time to Respond to Plaintiff's Complaint. Based on Defendant's Motion, and for good cause shown, it is so ORDERED that Defendant's Motion is GRANTED. The deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint is extended, up to and including Thursday, February 19, 2026.

SO ORDERED, this _____ day of _____, 20____.

Clerk of Court