

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

Case Number: 23-20514-CLC

BIRD GLOBAL, INC.

Adversary Number: 25-01344-CLC

CITY OF LONG BEACH, a California
municipal corporation,

Chapter 11

Plaintiff,

v.

DANIEL DIAMANTIDES-ABEL; RYAN DANESHHRAD;
TARYN JACOBSON; MICHELLE DOR; AND RYAN
DANESHHRAD LAW PC D/B/A LA CENTURY LAW,

Defendants,

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
FILE RESPONSE TO ADVERSARY COMPLAINT**

Defendants, Daniel Diamantides-Abel, Ryan Daneshrad, Taryn Jacobson, Michelle Dor, and Ryan Daneshrad Law PC d/b/a LA Century Law (collectively the “Defendants”), pursuant to Rule 9006(b), Fed. R. Bankr. P., 11 U.S.C. § 105, and L.R. 9013-1(C)(1) of the U.S. Bankruptcy Court, Southern District of Florida, respectfully move the Court for entry of an Order, substantially in the form of the attached **Exhibit “A”**, extending their time, up to and including Monday, December 15, 2025, to file a response to the Complaint for Preliminary and Permanent Injunctive Relief and for Declaratory Relief (“Adversary Complaint”) [ECF 1], filed by Plaintiff, City of Long Beach (“Plaintiff”). In further support, Defendants state as follows:

1. On October 23, 2025, Plaintiff filed its Adversary Complaint [ECF 1].
2. Defendants’ response to the Adversary Complaint is due by Monday, November 24, 2025.

3. Defendants recently retained undersigned counsel, and due to the press of business and existing professional obligations, counsel principally responsible for preparing Defendants' response requires a short extension of time to complete the filing.

4. Defendants respectfully request that the Court enter an Order, substantially in the form of the attached "Exhibit A", extending their time to file a response to the Adversary Complaint, up to and including Monday, December 15, 2025.

5. Counsel has conferred with counsel for Plaintiff, who does not oppose the relief requested in this Motion.

6. This unopposed Motion is brought in good faith and not for purposes of delay.

WHEREFORE, Defendants, Daniel Diamantides-Abel, Ryan Daneshrad, Taryn Jacobson, Michelle Dor, and Ryan Daneshrad Law PC d/b/a LA Century Law, respectfully request that the Court enter an Order, substantially in the form of the attached Exhibit "A": (a) granting this unopposed Motion; (b) extending their time to file a response to the Adversary Complaint, up to and including Monday, December 15, 2025; and (c) granting such further relief as the Court deems proper.

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 9013-1(C)(1)

I HEREBY CERTIFY that, pursuant to L.R. 9013-1(C)(1), the undersigned counsel conferred with counsel for Plaintiff, who does not oppose the relief requested in this Motion.

Dated: November 21, 2025.

Respectfully submitted,

EPGD ATTORNEYS AT LAW, P.A.
Attorneys for Defendants
777 SW 37th Ave. Ste. 510
Miami, FL 33135
T: (786) 837-6787
F: (305) 718-0687
sarah@epgdllaw.com

BY: /s/ Sarah Denis
Sarah Denis, Esq.
Florida Bar No.: 1010695

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served on all counsel of record or *pro se* parties on the Court's CM/ECF notification to those parties who are registered CM/ECF participants in this case on November 21, 2025.

BY: /s/ Sarah Denis
Sarah Denis, Esq.
Florida Bar No.: 1010695

SERVICE LIST

United States Bankruptcy Court, Southern District of Florida

The following parties are registered to receive NEF and will be served electronically through the Court's CM/ECF system:

- Steven M Berman
 - sberman@shumaker.com
 - jmasters@shumaker.com
 - belliot@shumaker.com
 - amatthews@shumaker.com
 - mbilirakis@shumaker.com

- Robert F. Elgidely
 - relgidely@foxrothschild.com
 - EAccetta@foxrothschild.com
 - rsolomon@foxrothschild.com
 - FL.DKT@foxrothschild.com

Exhibit “A”

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

In re:

Case Number: 23-20514-CLC

BIRD GLOBAL, INC.

Adversary Number: 25-01344-CLC

CITY OF LONG BEACH, a California
municipal corporation,

Chapter 11

Plaintiff,

v.

DANIEL DIAMANTIDES-ABEL; RYAN DANESHHRAD;
TARYN JACOBSON; MICHELLE DOR; AND RYAN
DANESHHRAD LAW PC D/B/A LA CENTURY LAW,

Defendants,

**ORDER GRANTING DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO ADVERSARY COMPLAINT**

THIS MATTER came before the Court on the Unopposed Motion for Extension of Time to File Response to Adversary Complaint ("Motion") filed by Defendants, Daniel Diamantides-Abel, Ryan Daneshrad, Taryn Jacobson, Michelle Dor, and Ryan Daneshrad Law PC d/b/a LA Century Law (collectively the "Defendants"). The Court having reviewed the Motion, and pleadings in this case, having noted the agreement of counsel and being fully apprised on the premises, it is **ORDERED** as follows:

1. The Motion is **GRANTED**.
2. The deadline for Defendants to file a response to the Complaint for Preliminary and Permanent Injunctive Relief and for Declaratory Relief ("Adversary Complaint") [ECF 1], is extended to Monday, December 15, 2025.

Submitted by:

Sarah Denis, Esq.
EPGD ATTORNEYS AT LAW, P.A.
777 SW 37TH AVE. STE. 510
MIAMI, FL 33135
T: (786) 837-6787
F: (305) 718-0687

(Attorney Denis, shall serve a copy of this order on the Trustee, all parties who have filed appearances in this case, and shall file a certificate of service thereof.)