

1 SHLOMO S. SHERMAN, ESQ.  
Nevada Bar No. 009688  
2 **SHERMAN LAW, PLLC**  
2620 Regatta Drive, Suite 102  
3 Las Vegas, Nevada 89128  
Telephone: (702) 900-2786  
4 Facsimile: (702) 714-0971  
E-Mail: shlomo@shermanlawlv.com

5 *Attorneys for Defendant Thrifty Consulting LLC*

6 **UNITED STATES DISTRICT COURT**  
7  
8 **DISTRICT OF NEVADA**

9 \* \* \*

10 ANTHONY MITCHELL,  
11  
12 Plaintiff,

13 v.

14 EMORY ANDREW TATE III, an individual;  
15 TRISTAN TATE, an individual;  
16 NEW ERA LEARNING LLC, dba “The Real  
17 World”;  
18 THRIFTY CONSULTING LLC, a Delaware LLC,  
19 THRIFT TECHNOLOGIES LLC, a Delaware LLC  
20 LEGENDARY COURSES INC. a Delaware  
21 corporation;  
22 ANDREW JOSLIN, an individual;  
23 DEFIED TRUST DIGITAL TRADING – FZCO  
24 LLC, a UAE free zone company;  
25 FUNDRAISER.COM OPERATOR (true identity  
26 unknown);  
27 COBRATATE.COM OPERATOR (self-identified  
as “Talisman Enterprises,” true identity unknown)  
28 JOINTHEREALWORLD.COM OPERATOR (true  
identity unknown);  
TOPG.COM OPERATOR (true identity unknown);  
ISSA (a/k/a @issathecooker, true name unknown);  
NEWERALEARNING.NET OPERATOR (true  
identity unknown);  
UNIVERSITY.COM OPERATOR (true identity  
unknown);  
THEWARROOM.AG OPERATOR (true identity  
unknown);  
and DOE DEFENDANTS 1-10, and ROE  
CORPORATIONS 1-5, inclusive,  
Defendants.

Case No. 2:26-cv-00720-RFB-BNW

**DEFENDANT THRIFTY  
CONSULTING LLC’S MOTION  
FOR EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF’S FIRST  
AMENDED COMPLAINT**

**(FIRST REQUEST)**

SHERMAN LAW, PLLC  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Tel: (702) 900-2786 / Fax: (702) 714-0971

**DEFENDANT THRIFTY CONSULTING LLC’S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

**(FIRST REQUEST)**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Defendant Thrifty Consulting LLC (“Defendant”) respectfully requests its first extension of time to file a responsive pleading to Plaintiff’s First Amended Complaint. This is Defendant’s first motion seeking an extension of time to file its response to the First Amended Complaint.

On May 29, 2026, at 1:51AM PST, *pro se* Plaintiff Anthony Mitchell (“Plaintiff”) e-mailed undersigned counsel and indicated that he would be filing a Second Amended Complaint (“SAC”) that would add unknown new defendants by June 2, 2026. Defendant’s primary out-of-state counsel reached out to Plaintiff by phone to confirm that this was his intention, and to request the courtesy of an extension of the time to respond to the First Amended Complaint in light of his intention to file a SAC. Plaintiff would not agree to such an extension, though he confirmed that the SAC was planned and would seek to add a number of new defendants.

The filing of a SAC would be the *second* time that Defendant’s response would be mooted by a superseding complaint. Therefore, to best preserve resources and in the interests of judicial economy, Defendant seeks to extend its responsive deadline by an additional 14 days, from June 1, 2026, until June 15, 2026, in light of the anticipated SAC.

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

///

///

///

///

///

///

///

///

///

SHERMAN LAW, PLLC  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Tel: (702) 900-2786 / Fax: (702) 714-0971

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

By filing this motion, Defendant does not waive any defenses available to it under Fed. R. Civ. P. 12.

DATED this 29<sup>th</sup> day of May, 2026.

**SHERMAN LAW, PLLC**

By 

SHLOMO S. SHERMAN, ESQ.  
Nevada Bar No. 009688  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128

*Attorneys for Defendant Thrifty Consulting LLC*

IT IS SO ORDERED:

\_\_\_\_\_  
United States Magistrate Judge

DATED: \_\_\_\_\_

SHERMAN LAW, PLLC  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Tel: (702) 900-2786 / Fax: (702) 714-0971

**DECLARATION OF DAVID A. BERNSTEIN, ESQ., IN SUPPORT OF DEFENDANT THRIFTY CONSULTING LLC’S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT**

I, DAVID A. BERNSTEIN, ESQ., hereby declare and state as follows:

1. I am an attorney with the law firm Buchalter P.C., primary out-of-state counsel for Defendant Thrifty Consulting LLC (“Thrifty”). I make this declaration in support of the Thrifty’s foregoing Motion for Extension of Time to Respond to Plaintiff’s First Amended Complaint (the “Motion”). I have personal knowledge of the facts stated in my declaration, and I am competent to testify regarding them.

2. On May 29, 2026, I received, from local Nevada counsel Shlomo S. Sherman, Esq., an e-mail that *pro se* Plaintiff Anthony Mitchell (“Plaintiff”) had sent on May 29, 20226, at 1:51 a.m., indicating that he would be filing a Second Amended Complaint (“SAC”) that would add unknown new defendants by June 2, 2026.

3. Pursuant to Fed. R. Civ. P. 15(a)(3), it is my understanding that Defendant’s response to the First Amended Complaint is due on June 1, 2026.

4. As this would be the second time that Defendant’s response would be mooted by a superseding complaint, I reached out to Plaintiff telephonically to confirm his intention to file a SAC, and to request the courtesy of an extension of the time to respond to the First Amended Complaint in light of his intention to file a SAC.

5. Plaintiff would not agree to such an extension, although he confirmed his intention to file a SAC.

6. I hereby declare that the above statement is true to the best of my knowledge and belief.

I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

EXECUTED on this 29<sup>th</sup> day of May, 2026.

/s/ David A. Bernstein  
DAVID A. BERNSTEIN, ESQ.

SHERMAN LAW, PLLC  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Tel: (702) 900-2786 / Fax: (702) 714-0971

**CERTIFICATE OF SERVICE**

I hereby certify that I am an employee of Sherman Law, PLLC and that on the 29th day of May, 2026, I caused to be served a true and correct copy of foregoing **DEFENDANT THRIFTY CONSULTING LLC’S MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S FIRST AMENDED COMPLAINT** in the following manner:

(ELECTRONIC SERVICE) The above-referenced document was electronically served on the date hereof through the Notice of Electronic Filing automatically generated by the Court’s facilities to those parties listed on the Court’s Master Service List.

*/s/ Shlomo S. Sherman*  
An Employee of SHERMAN LAW, PLLC

SHERMAN LAW, PLLC  
2620 Regatta Drive, Suite 102  
Las Vegas, Nevada 89128  
Tel: (702) 900-2786 / Fax: (702) 714-0971

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28