

**In the United States Court of Appeals
for the Eleventh Circuit**

Stefan Passantino,

Appellant

v.

United States of America,

Appellee

On Appeal from the United States District Court
for the Northern District of Georgia
District Court Case Number 4:23-cv-00300-ELR

**APPELLANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE REPLY BRIEF**

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COUNSEL FOR APPELLANT

CERTIFICATE OF INTERESTED PERSONS AND CORPORATE DISCLOSURE STATEMENT

Appellant files this Certificate of Interested Persons and Corporate Disclosure Statement, listing the parties and entities interested in this appeal, as required by 11th Cir. R. 26.1.

Ben-David, Neeli

Binnall, Jesse R.

Buchanan, Ryan

Flynn, Shawn M.

Jackson, A. Jonathan

Mendel, Gabriel A.

Moultrie, Jr., Richard S.

Passantino, Stefan

Roberts, Jared J.

Ross, Elanor L. Honorable

Sandoval, Andres H.

Tyson, Bryan P.

United States of America

**APPELLANT'S UNOPPOSED MOTION TO EXTEND
TIME TO FILE REPLY BRIEF**

Appellant, Stefan Passantino, respectfully moves to extend by 60 days the time to file his reply brief. Good cause exists for this extension.

1. Appellant's reply brief in this appeal is due to be filed on September 19, 2025. Appellant has previously been granted a telephonic 30-day extension of time, and the Court has granted a motion for an additional 30 days.

2. Since Appellant's last extension, the parties have engaged in settlement discussions. Accordingly, Appellant seeks an additional 60 days so that the parties may continue those settlement discussions and potentially resolve this matter.

3. The interests of justice and judicial economy will be served by permitting this extension of time in the context of ongoing settlement discussions. Appellant's counsel conferred with Appellee's counsel regarding the relief sought in this motion, and Appellee consents to this extension request.

WHEREFORE, Appellant respectfully requests that this Court extend the time to file the reply brief by 60 days, such that the brief will be due on November 18, 2025.

Dated: September 19, 2025

Respectfully, submitted

/s/ *Jesse R. Binnall*

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Counsel for Appellant
Stefan Passantino

CERTIFICATE OF COMPLIANCE

I hereby certify that this motion contains 178 words and complies with the typeface and type-style requirement of Fed. R. App. P. 32(a)(5) and (6) because it was prepared in a proportionally spaced typeface using Microsoft Word in 14-point Century font.

Dated: September 19, 2025

Respectfully submitted,

/s/ Jesse R. Binnall
Jesse R. Binnall

Counsel for Appellant
Stefan Passantino

CERTIFICATE OF SERVICE

I certify that on September 19, 2025, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jesse R. Binnall
Jesse R. Binnall

Counsel for Appellant
Stefan Passantino