

UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF FLORIDA

OLEG ZHUKOVSKIY, *et al.*,

Plaintiffs,

v.

NATIONAL BANK OF UKRAINE,

Defendant.

Case No: 21-20019-CIV-
MARTINEZ/BECERRA

UNOPPOSED MOTION FOR STAY

Defendant National Bank of Ukraine (“NBU”) respectfully moves for an immediate thirty (30) day stay of this case. As grounds for this motion, NBU states as follows:

1. NBU submits that Ukraine is currently the victim of a foreign military invasion, and that the Ukrainian government needs to focus all of its efforts on addressing this invasion crisis.
2. As most of the case deadlines have already been stayed, the practical effect of the stay requested herein would be to extend (A) Plaintiffs’ March 8, 2022 deadline to file a Second Amended Complaint and (B) NBU’s corresponding deadline to respond to the Second Amended Complaint within forty-five (45) days. *See* Dkt. 62. The due date for Plaintiffs’ Second Amended Complaint would become March 28, 2022 and NBU’s response would be due May 12, 2022.
3. Counsel for the Plaintiffs has indicated that Plaintiffs do not oppose a thirty (30) day stay of this case as set forth in paragraph 2 above.

CONCLUSION

WHEREFORE, Defendant NBU respectfully requests that this Honorable Court (1) enter an immediate thirty (30) day stay of this proceeding, (2) extend to April 7, 2022 the deadline for Plaintiffs to file a Second Amended Complaint; and (3) set a May 12, 2022 deadline for NBU to respond to the Second Amended Complaint.

Respectfully submitted,

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