

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
GREENSBORO DIVISION**

JAMES CURTIN,)	
)	
Plaintiff,)	Civil Action No.
)	1:26-cv-00472-TDS-JGM
v.)	
)	
CYBERLUX CORPORATION, et al.,)	
)	
Defendants.)	

**DEFENDANT CYBERLUX CORPORATION’S MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

(Fed. R. Civ. P. 6(b)(1)(A); L.R. 6.1(a))

Defendant Cyberlux Corporation (“Cyberlux”), by and through undersigned counsel, respectfully moves this Court pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 6.1(a) for an Order extending the time within which Cyberlux must answer, move, or otherwise respond to Plaintiff’s Complaint. In support, Cyberlux shows the following:

1. Plaintiff filed the Complaint in this action on May 22, 2026. Cyberlux was served with the Summons and Complaint on June 1, 2026.
2. Cyberlux’s current deadline to answer, move, or otherwise respond to the Complaint is June 22, 2026. This Motion is filed before that deadline has expired.
3. No prior extensions of time to respond to the Complaint have been requested by or granted to Cyberlux.
4. Undersigned counsel has recently entered an appearance on behalf of Cyberlux and requires additional time to review the allegations of the Complaint, investigate the underlying facts, and prepare an appropriate response, which may include a motion pursuant to Rule 12 of the Federal Rules of Civil Procedure.

5. Good cause exists for the requested extension. The extension is sought in good faith and not for purposes of delay, and no party will be prejudiced by the relief requested.
6. Cyberlux requests an extension of twenty-one (21) days, through and including July 13, 2026, within which to answer, move, or otherwise respond to the Complaint.
7. Undersigned counsel was unable to ascertain Plaintiff's position prior to filing.

WHEREFORE, Cyberlux respectfully requests that the Court grant this Motion and extend the time for Cyberlux to answer, move, or otherwise respond to the Complaint through and including July 13, 2026, and grant such other and further relief as the Court deems just and proper. A proposed Order is submitted herewith.

This the 19th day of June, 2026.

WATTS LAW PLLC

/s/ Charles D. Watts, Jr.
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Counsel for Defendant Cyberlux Corporation

CERTIFICATE OF SERVICE

I hereby certify that on the date set forth below, I 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 registered as CM/ECF users.

I further certify that I served the foregoing on the following party, who is not a registered CM/ECF user, by depositing a copy thereof in the United States mail, first-class, postage prepaid, addressed as follows:

James Curtin (Plaintiff, pro se)

12 Tobey Court
Pittsford, New York 14534

This the 19th day of June, 2026.

/s/ Charles D. Watts, Jr.
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