

Carsten J Gallini  
3813 Ashbury Road  
Round Rock, Texas 78681

AUSTIN TX 786

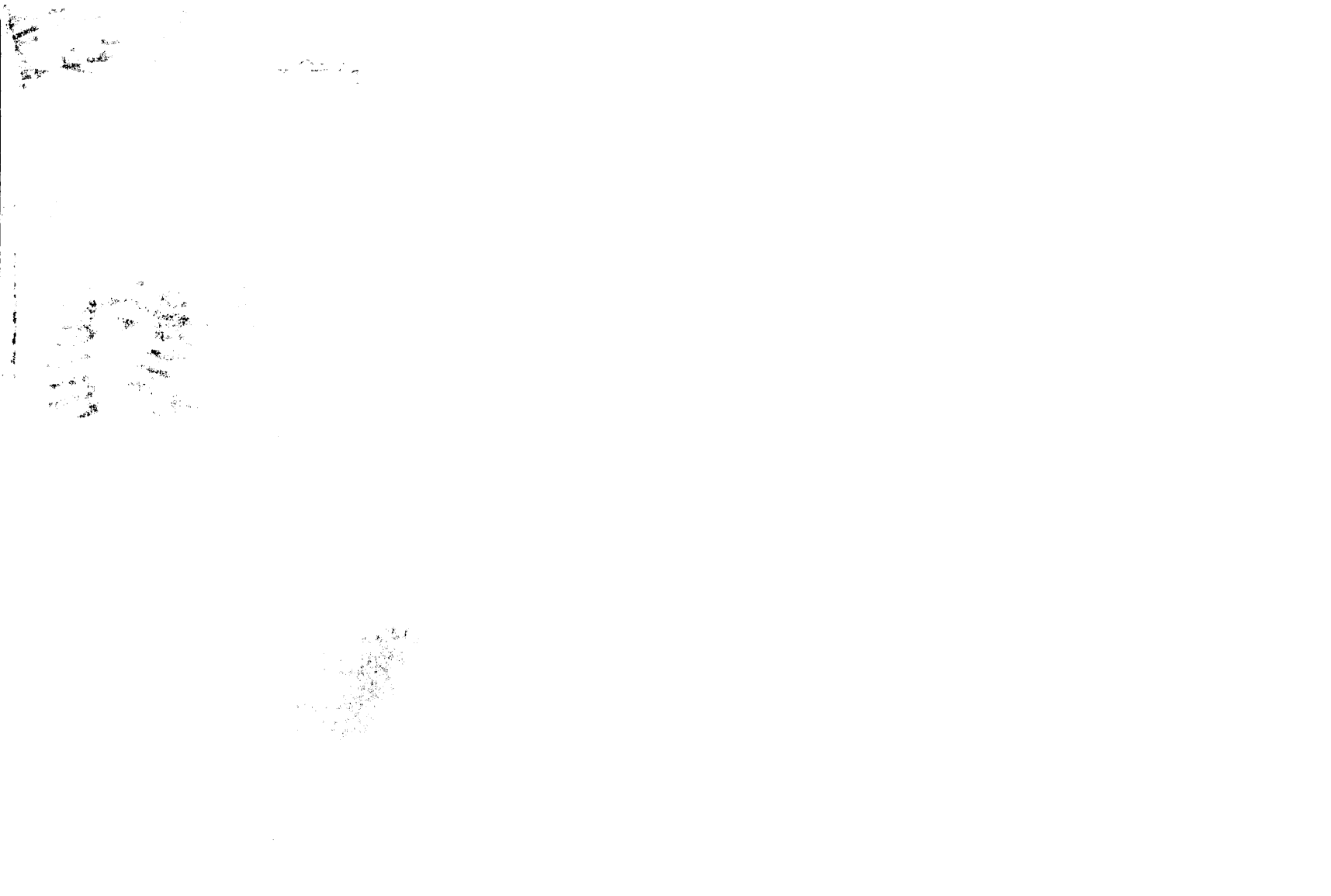
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Bryan Donald Fields  
501 80th Ave  
St. Petersburg Beach, FL 33706

33706-160501





**STATE OF NORTH CAROLINA  
WAKE COUNTY**

**IN THE GENERAL COURT OF JUSTICE  
SUPERIOR COURT DIVISION  
22-CVS-14854**

**KENNETH L. BRYANT,** )  
 )  
 **Plaintiff,** )  
 )  
 v. )  
 )  
 **BRYAN DONALD FIELDS and** )  
 **CARSTEN JASON GALLINI,** )  
 )  
 **Defendants.** )

**SECOND MOTION TO EXTEND TIME  
TO FILE ANSWER  
ON BEHALF OF DEFENDANT  
CARSTEN JASON GALLINI**

TO THE HONORABLE JUDGE:

NOW COMES myself, Defendant Carsten Jason Gallini (hereinafter “Gallini”), by special and limited appearance pursuant to Rule 12 of the North Carolina Rules of Civil Procedure (hereinafter “N.C.R. Civ. P.”), and I hereby move this Court, pursuant to N.C.R. Civ. P. 6 and 12, for a second extension of time to file my original answer to Plaintiff’s complaint to March 27, 2023, and would show the Court as follows:

1. This case was filed on or about December 5, 2022, and I was served with process at my city of residency, Round Rock, in the State of Texas, on December 28, 2022.
2. I filed a first motion to extend time to file my original answer and the motion as granted, extending the date to answer to February 27, 2023. The reason for the request for extension was because I had filed in this case a Motion to Dismiss based on lack of personal jurisdiction according to N.C.R. Civ. P. 12(b)(2) and entered a special and limited appearance for that purpose. I was hoping that the motion to dismiss case would be determined before my answer date.
3. The Motion to Dismiss that I filed in this case has not yet been considered by the Court. I called the clerk’s office a few times to check the status of the motion and the latest such

contact was on February 24, 2023. The deputy clerk, Lilian, verified that the Motion to Dismiss had not been considered and no order was present in the online case folder or the physical case folder. I was transferred to the Superior Court Coordinator's (Lisa Tucker) extension but the voicemail advised to send an email. I sent an email on February 24, 2023, to the Superior Court Coordinator in order to check the status of the motion to dismiss that I had filed as well as to see if anything further was needed by the court in order to schedule the review of the motion. I have not received a response just yet prior to preparing this motion for extension of time.

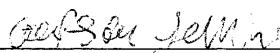
4. I request that an additional extension of time for "just cause" be given since my Motion to Dismiss based on N.C.R. Civ. P. 12(b)(2) lack of personal jurisdiction is still pending before the court.

5. I do not make this request for an extension of time for the purpose of delay or hindrance of the Court process. Granting an extension of time will serve no real prejudice to either the Plaintiff or the other Defendant since filed Motions to Dismiss must be first considered by the Court before the case proceeds.

6. Follows is my sworn statement under the penalty of perjury in support of this second motion for extension of time.

WHEREFORE, PREMISES CONSIDERED, I pray that upon consideration that this Court will grant this Second Motion to Extend Time to File Answer and for all such other and further relief to which I may be entitled in law or equity.

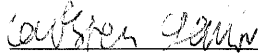
Respectfully Submitted on February 27, 2023,

  
\_\_\_\_\_  
Carsten Jason Gallini  
*Pro Se Defendant*

3813 Ashbury Rd.  
Round Rock, Texas 78681  
(512) 689-8581  
Carsten.gallini@gmail.com

**SWORN STATEMENT UNDER THE PENALTY OF PERJURY**

I declare under the penalty of perjury that I have read the foregoing Second Motion for Extension of Time and the information therein is true and correct.



\_\_\_\_\_  
Carsten Jason Gallini  
*Pro Se Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 27, 2023, the foregoing Second Motion to Extend Time to File Answer was served by depositing a true copy thereof with the USPS via First Class Mail, postage pre-paid.

John M. Kirby, Esq.  
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\_\_\_\_\_  
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