UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GILBERT P. HYATT,
Plaintiff

Civil Action No. 26-cv-03505 RDM

v.

MICHAEL R. CAPUTO d/b/a MICHAEL CAPUTO PUBLIC RELATIONS, MICHAEL CAPUTO PUBLIC RELATIONS, INC., JONN KEAMY, REGAL FINANCIAL, JOHN DOE NOS. 1-10, ABC ENTITY NOS. 1-10,
Defendants.

DEFENDANT MICHAEL R. CAPUTO'S REPLY IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO RESPOND TO THE AMENDED COMPLAINT

Defendant Michael R. Caputo, individually and doing business as Michael Caputo Public Relations ("Defendant" or "Caputo"), respectfully submits this Reply in support of his Motion for Extension of Time to Respond to the Amended Complaint (Dkt. 4) and in response to Plaintiff's Response (Dkt. 6). In support, Defendant states as follows:

1. Plaintiff does not oppose an extension of time but requests that the Court limit any extension to 30 days rather than the 60 days Defendant seeks. Defendant respectfully submits that 60 days is the more appropriate and necessary period under the circumstances.

2. The Amended Complaint is exceptionally long and relatively incoherent. It contains a sprawling set of allegations, references to prior correspondence, and claims that are not clearly or coherently pleaded. A competent lawyer will need substantial time simply to digest the pleading, identify the operative claims and factual allegations, separate what is properly pleaded from what is not, and begin to formulate a reasoned response. That task cannot be accomplished responsibly in the truncated period Plaintiff proposes.

3. Plaintiff's reliance on earlier demand letters and preservation notices is misplaced. Those communications, whatever their content, are not a substitute for responding to the formal Amended Complaint. A lawyer retained to defend this action must review and analyze the specific allegations as they appear in the operative pleading, not merely reconstruct a dispute from a series of prior letters. The length and lack of clarity in the Amended Complaint make that work particularly time intensive.

4. Defendant is proceeding pro se for the full defense of this action. He requires a reasonable period to identify, interview, and engage qualified legal counsel who can undertake the necessary review of an exceptionally long and relatively incoherent complaint and then prepare a proper responsive pleading or brief. The additional time is sought in good faith, is not for purposes of delay, and will not unduly prejudice Plaintiff, particularly given that the Court has already stayed Defendant's obligation to respond pending further order.

5. Defendant previously informed Michael Caputo Public Relations, Jonn Keamy, and Regal Financial of the request for additional time, and those parties consented. That consent further supports granting the full 60-day extension.

6. For these reasons, the Court should grant Defendant's Motion for Extension of Time in full and extend the deadline by sixty (60) days from the current deadline (or such other date as the Court deems appropriate after resolution of the pending show-cause order).

WHEREFORE, Defendant Michael R. Caputo respectfully requests that this Court:

(a) Grant Defendant's Motion for Extension of Time to Respond to the Amended Complaint in full;

(b) Extend the deadline for Defendant to file his required reply brief (or answer or other responsive pleading) by an additional sixty (60) days;

(c) Deny Plaintiff's request to limit any extension to 30 days; and

(d) Grant such other and further relief as the Court deems just and proper.

Dated: October 16, 2026

Respectfully submitted,

Michael R. Caputo
5352 Ferrari Avenue
Ave Maria, Florida 34142
Tel: 716-867-5554
Email: mc@CaputoPR.com
Defendant pro se

CERTIFICATE OF SERVICE

I hereby certify that on October 16, 2026, I served a true and correct copy of the foregoing Reply in Support of Motion for Extension of Time upon counsel for Plaintiff by electronic mail at the following address:

Jack F. Korba (D.C. Bar No. 1010303)
Foley & Lardner LLP
3000 K Street, N.W., Suite 600
Washington, DC 20007
Telephone: (202) 295-4110
Jack.Korba@Foley.com

and upon all other parties who have appeared or been served in this action.

Dated: October 16, 2026

Respectfully submitted,

Michael R. Caputo
5352 Ferrari Avenue
Ave Maria, Florida 34142
Tel: 716-867-5554
Email: mc@CaputoPR.com
Defendant pro se