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Counsel for the Plaintiff

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

AFG Companies, Inc.,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	
)	Case No. 25-CV-00104
GENUINE LIFETIME LLC, a Wyoming)	
Limited Liability Company; BRAND)	
ENGAGEMENT NETWORK INC., a Wyoming)	
for Profit Corporation, d/b/a/ BEN AI, d/b/a BEN,)	
f/k/a BLOCKCHAIN EXCHANGE NETWORK)	
INC.; OCTOBER 3 RD HOLDINGS LLC, a)	
Wyoming Limited Liability Company; MICHAEL)	
LUCAS, individually; TYLER LUCK, Individually,)	
DUE FIGLIE, LLC, a Wyoming Limited Liability)	
Company, SHAWN LUCAS, individually,)	
)	
<i>Defendants.</i>)	

**MOTION FOR EXTENSION OF DEADLINE TO AMEND AND TO
 SERVE SHAWN LUCAS**

COMES NOW AFG Companies, Inc., (the “Plaintiff”), by and through their Counsel, WALKER LAW, pursuant to Fed.R.Civ.P. 6(b)(1)(A) and U.S.D.C.L.R. 6.1(b), and hereby respectfully moves to extend by twenty (20) days the deadline for Plaintiff within which to

Amend its Complaint and to serve Shawn Lucas, as set forth within this Court's November 14, 2025 Order Granting Defendants' Motion to Dismiss.

Plaintiff states that it allowed Defendants significant time to respond to the Complaint filed in this matter. Defendants will not be prejudiced through an extension of time, and the complexity of the case and parallel proceedings in other jurisdictions warrants an extension of time to potentially resolve or minimize issues preliminarily, prior to commencing discovery or litigating potentially duplicative issues.

Additionally, Plaintiff is in the process of evaluating whether, in light of other litigation between the Parties in other states, it should move to dismiss some or all of its claims, or similar process, in the interests of judicial economy.

Counsel for the Plaintiff consulted with Defendants' Counsel who had not yet responded by the time of the filing of this Motion as to whether they will consent to this requested extension.

DATED this 15th day of December, 2025.

/s/ Robert J. Walker
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