

**IN THE STATE OF MISSOURI  
JACKSON COUNTY SIXTEENTH CIRCUIT COURT  
AT INDEPENDENCE**

|   |   |                       |
|---|---|-----------------------|
| SAMUEL K. LIPARI,                             | ) |                       |
|   | ) |                       |
| Plaintiff,                                    | ) |                       |
|   | ) |                       |
| v.  | ) | Case No. 0916-CV38273 |
|   | ) | Division 15           |
| CHAPEL RIDGE MULTIFAMILY LLC, <i>et al.</i> , | ) |                       |
|   | ) |                       |
| Defendants.                                   | ) |                       |

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME  
IN WHICH TO RESPOND TO WACHOVIA DEALER SERVICES INC’S MOTION TO DISMISS**

Comes now the petitioner, Samuel K. Lipari appearing *pro se* and respectfully requests an extension of time in which to answer the defendant WACHOVIA DEALER SERVICES INC’s motion to dismiss and its accompanying suggestion of law. The plaintiff respectfully requests the extension for the following reasons:

1. WACHOVIA DEALER SERVICES INC’s motion to dismiss was not sent by email and the plaintiff did not receive a copy by US Mail until February 19, 2010.
2. WACHOVIA DEALER SERVICES INC may seek to withdraw their motion to dismiss for compliance with counsel’s responsibilities under 55.03 (c)(2) when Amended Petition has been repeatedly shown to state facts supported with an affidavit and documents created by the defendant that substantiate claims for racketeering and racketeering conspiracy against the RICO defendants including WACHOVIA DEALER SERVICES INC.
3. The plaintiff will require 2 weeks in which to answer challenges to the petition given the numerous acts committed by WACHOVIA DEALER SERVICES INC and its co-conspirators.

Whereas for the above stated reasons the plaintiff respectfully requests the court grant an extension until March 8 in which to respond to WACHOVIA DEALER SERVICES INC’s motion and suggestion for dismissal.

Respectfully submitted,

S/ Samuel K. Lipari

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SAMUEL K. LIPARI  
PLAINTIFF *PRO SE*.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was forwarded this 22nd day of February 2010 by hand delivery, by first class mail postage prepaid, or by email to:

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