



4. On August 19, 2025, Defendants jointly moved to dismiss the Complaint (ECF Nos. 114–117). The parties fully briefed and argued that joint motion between then and January (ECF Nos. 114–117, 120–122, 128–130, 143). The Court ruled on Defendants’ joint motion on March 25, 2026—dismissing Count VIII of the Complaint but otherwise denying the motion (ECF No. 147).
5. Pursuant to Fed. R. Civ. P. 12(a)(4)(A), Defendants now have until April 8, 2026—fourteen days after the Court’s disposition of the joint motion to dismiss—to file their answers to the surviving allegations and counts in the Complaint. Given the extended length and complexity of the Complaint, that default fourteen-day period provides insufficient time for Defendants to appropriately prepare and file answers.
6. Defendants therefore respectfully request an extension of their answer deadlines by 44 additional days to May 22, 2026, which would afford each of them a total of 58 days to prepare and file an answer following the Court’s disposition of the motion to dismiss.
7. Defendants’ requested extension is reasonable. The Complaint is lengthy (over 200 pages and nearly 900 paragraphs) and Defendants need adequate time to prepare their answers and affirmative defenses to it.
8. Defendants’ requested extension will not prejudice the Government or any other party, especially in light of the extended time the Government already has taken: (a) to conduct its investigation while the Relator’s original *Qui Tam* Complaint, filed on November 2, 2021, remained under seal (more than three years); (b) to prepare and file its own Complaint after electing to partially intervene (more than three months); and (c) to seek waivers of service from Defendants after filing its

Complaint (nearly two months). Defendants here simply request a proportional amount of time to prepare their responsive pleadings.

9. Defendants have sought the Government's assent to the extension requested herein. The Government has advised that it does not assent to the proportional extension Defendants seek and instead assents only to an additional fourteen days (until April 22<sup>nd</sup>) for Defendants to answer. Given the length and complexity of the Complaint, this would unfairly prejudice Defendants by providing them with insufficient time to appropriately prepare and file answers.

For all of these reasons, Defendants respectfully move for enlargement of their answer deadlines to May 22, 2026.

Dated: April 1, 2026

Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH L.R., D. MASS. 7.1(A)(2)**

I hereby certify that counsel for all parties have met and conferred in good faith regarding the subject matter of this motion, but have been unable to resolve the issues addressed.

*/s/ David Quinn Gacioch*  
David Quinn Gacioch  
Dated: April 1, 2026

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document will be served upon all counsel of record via ECF on the date of this filing.

*/s/ David Quinn Gacioch*  
David Quinn Gacioch  
Dated: April 1, 2026