

MARION COUNTY SUPERIOR COURT  
STATE OF INDIANA

ALFARAH RESTAURANT GROUP )  
OF IN, INC., )  
 )  
Plaintiff, )  
 )  
v. ) CAUSE NO.: 49D01-2311-PL-045310  
 )  
TACO BELL FRANCISOR, LLC and )  
FLYNN RESTAURANT GROUP, LP, )  
 )  
Defendants. )

**DEFENDANT FLYNN RESTAURANT GROUP, LP'S**  
**MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO**  
**PLAINTIFF'S COMPLAINT**

Comes now Defendant Flynn Restaurant Group, LP, by counsel, and respectfully petitions the Court for a 30-day enlargement of time up to and including January 22, 2024 to Answer or otherwise respond to Plaintiff's Complaint and in support state:

1. On or about November 21, 2023, Plaintiff Alfarah Restaurant Group of IN, Inc. brought suit against Defendant Flynn Restaurant Group, LP.
2. Defendant Flynn Restaurant Group, LP was served via certified mail on November 29, 2023.
- 3.. Defendant Flynn Restaurant Group, LP's answer or responsive pleading to Plaintiff's Complaint is due on or before December 22, 2023 and said time has not expired.
4. Defendant respectfully petitions the Court for a 30-day enlargement of time, up to and including January 22, 2024 to Answer or otherwise respond to Plaintiff's Complaint. Additional time is necessary to allow the undersigned an opportunity to conduct an investigation, meet with his client and otherwise prepare an appropriate Answer or response.

5. This Motion is not made for purposes for vexation or delay.

WHEREFORE, Defendant Flynn Restaurant Group, LP, by counsel, prays for a 30-day enlargement of time, up to and including January 22, 2024 to Answer or otherwise respond to Plaintiff's Complaint and for all other relief proper in the premises.

DREWRY SIMMONS VORNEHM LLP

*/s/ Anthony M. Eleftheri*

ANTHONY M. ELEFOTHERI, #19336-49  
*Counsel for Flynn Restaurant Group, LP*

Drewry Simmons Vornehm, LLP  
736 Hanover Place, Suite 200  
Carmel, IN 46032  
Phone: (317) 580-4848  
Fax: (317) 580-4855  
[aeleftheri@DSVlaw.com](mailto:aeleftheri@DSVlaw.com)

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, pursuant to Rule 86(B)(3) of the Indiana Rules of Trial Procedure, a copy of the foregoing has been served on all counsel of record via E-Service through the Indiana E-Filing System, on December 18, 2023.

Stephen E. Ferrucci  
Sean T. White  
CLAPP FERRUCCI  
8766 South Street, Suite 210  
Fishers, IN 46038  
[swhite@seanmclapp.com](mailto:swhite@seanmclapp.com)  
[sferrucci@seanmclapp.com](mailto:sferrucci@seanmclapp.com)  
*Counsel for Plaintiff*

*/s/ Anthony M. Eleftheri*  
ANTHONY M. ELEFOTHERI, #19336-49  
*Counsel for Flynn Restaurant Group, LP*

Drewry Simmons Vornehm, LLP  
736 Hanover Place, Suite 200  
Carmel, IN 46032  
Phone: (317) 580-4848  
Fax: (317) 580-4855  
[aeleftheri@DSVlaw.com](mailto:aeleftheri@DSVlaw.com)