

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE #: 0:26-cv-60997-DSW

KARL JOBST,

Plaintiff,

vs.

WILLIAM JAMES MITCHELL,

Defendant,

DEFENDANT'S MOTION FOR LEAVE TO FILE AMENDED REPLY IN SUPPORT OF
MOTION FOR SECURITY FOR COSTS

Defendant, WILLIAM JAMES MITCHELL ("Defendant"), by and through undersigned counsel, respectfully moves for leave to file the attached Amended Reply in Support of Motion for Security for Costs and states:

1. On June 19, 2026, Defendant filed a Reply in Support of Motion for Security for Costs. [ECF No. 24].
2. Defendant respectfully seeks leave to file the attached Amended Reply in Support of Motion for Security for Costs.
3. The proposed Amended Reply does not assert new claims, new grounds for relief, new facts, or new substantive arguments. Rather, it streamlines portions of the previously filed Reply while addressing the same issues raised in Plaintiff's Opposition.
4. Granting leave will not prejudice Plaintiff. The proposed Amended Reply seeks no relief beyond that requested in Defendant's Motion for Security for Costs.

5. Leave should therefore be granted in the interests of judicial economy and efficient resolution of the issues before the Court.

WHEREFORE, Defendant respectfully requests that the Court grant leave to file the attached Amended Reply in Support of Motion for Security for Costs and accept the Amended Reply as the operative reply memorandum, together with such other and further relief as the Court deems just and proper.

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), undersigned counsel certifies that she conferred with Plaintiff, Karl Jobst, regarding the relief requested herein. Plaintiff does not oppose Defendant's request for leave to file the proposed amended reply.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24th day of June 2026, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system or by email to all parties. I further certify that I either mailed the foregoing document and the Notice of Electronic Filing by first class mail to any non CM/ECF participants and/or the foregoing document was served via transmission of Notice of Electronic Filing generated by CM/ECF to any and all active CM/ECF participants.

/s/Michele T. Mitchell
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