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**IN THE CIRCUIT COURT OF SEARCY COUNTY, ARKANSAS
CIVIL DIVISION**

MICHAEL PIETRCZAK

PLAINTIFF

V.

CASE NO. 65CV-21-20

**RURAL REVIVAL LIVING TRUST; AND
LAURA LYNN**

DEFENDANTS

**MOTION FOR EXTENSION OF TIME TO PERFECT SERVICE
AND BRIEF IN SUPPORT THEREOF**

Comes now the Plaintiff, Michael Pietrczak, via attorney, William Z. White, who in support of this Motion for Extension of Time to Perfect Service and Brief in Support Thereof, states and alleges as follows:

1. On August 4, 2021, the Plaintiff, Michael Pietrczak, came before the Court via Zoom accompanied by William Z. White. Laura Lynn was present before the Court via Zoom representing herself pro se.
2. Laura Lynn initially requested a continuance of the hearing to be held on August 4, 2021.
3. Laura Lynn filed several pleadings and discovery requests in the days leading up to the hearing date.

4. Michael Pietrczak's Motion for Extension of Time to Perfect Service is brought forth pursuant to Ark. R. Civ. P. 4. (i)(2) states:

The court, on written motion and a showing of good cause, may extend the time for service if the motion is made within 120 days of the filing of the suit or within the time period established by a previous extension. To be effective, an order granting an extension must be entered within 30 days after the motion to extend is filed, by the end of the 120-day period, or by the end of the period established by the previous extension, whichever date is later.

5. Michael Pietrczak filed his complaint on April 23, 2021. As of August 4, 2021, Michael Pietrczak had seventeen (17) days remaining pursuant to Ark. R. Civ. P. 4 to serve Laura Lynn and the Rural Revival Living Trust pursuant to Ark. R. Civ. P. 4.

6. Michael Pietrczak made an oral Motion for Extension of Time to Perfect Service during the August 4, 2021, hearing, which was granted by the Court.

7. This Motion to Extend Time to Perfect Service has been made within one hundred and twenty (120) days of the filing of his complaint.

8. Michael Pietrczak has been unable to locate Laura Lynn and/or the Rural Revival Living Trust because of their continued attempts to evade service.

9. Michael Pietrczak needs additional time to attempt to locate and serve Defendants, Laura Lynn and/or the Rural Revival Living Trust.

10. Plaintiff, Michael Pietrczak, requests this Court enter its written order confirming its oral ruling from the Bench that he be granted an additional one hundred and twenty (120) days for good cause shown to serve the Laura Lynn and the Rural Revival Living Trust.

Wherefore, Plaintiff requests that this Court extends the time in which is required to serve the Defendants and for all other relief in which he is entitled.

Respectfully submitted on behalf of the
Plaintiff, Michael Pietrczak.


By: Wm. Z. White
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CERTIFICATE OF SERVICE

I, William Z. White, hereby certify that a true and correct copy of the foregoing pleading has been served upon opposing counsel of record and/or other interested parties in this case as set forth below either by hand delivery, facsimile, email, electronic mail, auto notification via the Court's ECF/E-File System other delivery methods _____, and/or depositing a copy of the same with the U.S. Postal Service with sufficient postage to arrive at its destination, addressed to the following:

Laura Lynn Hammett
16 Gold Lake Clube Road
Conway, AR 72032
Bohemian_books@yahoo.com

Dated: Wednesday, August 18, 21



William Z White