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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 JPMORGAN CHASE BANK, N.A.,

14 Plaintiff,

15 v.

16 MICAH REED,

17 Defendant.

Case No.: 2:24-cv-09243

**PLAINTIFF’S RESPONSE TO ORDER
TO SHOW CAUSE**

Judge: Hon. Percy Anderson

Action Filed: October 28, 2024

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PLAINTIFF’S RESPONSE TO ORDER TO SHOW CAUSE

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2 Plaintiff JPMorgan Chase Bank, N.A. (“Chase”) hereby responds to the Court’s
3 Order to Show Cause as to why this action should not be dismissed for want of prosecution.
4 (ECF No. 14.) At the outset, Chase notes that it fully accepts the Court’s denial of the
5 parties’ stipulation to extend Defendant Micah Reed’s (“Defendant”) answer deadline and
6 regrets the Court’s expenditure of judicial resources, time, and efforts in addressing the
7 present issue.

8 In light of the Court’s denial of the parties’ most recent stipulation to extend
9 Defendant’s response deadline, Chase filed a request for entry of default against Defendant
10 on April 7, 2025. Chase has acted in good faith and did not agree to extend Defendant’s
11 response deadline for any improper purpose or delay. Instead, Chase agreed to extend
12 Defendant’s response deadline at Defendant’s request and due to circumstances unforeseen
13 to Chase at the time it filed the Complaint.

14 After Chase filed and served the Complaint, Defendant’s criminal counsel requested
15 an extension for Defendant to file an Answer or other responsive pleading based on
16 extenuating circumstances in connection with a criminal investigation. Chase agreed to
17 extend Defendant’s response deadline pursuant to Local Rule 8-3 as a courtesy to allow
18 time for Defendant to secure civil counsel to represent him in the above-captioned action.

19 With the investigation still ongoing, Defendant’s criminal counsel again requested an
20 extension of Defendant’s response deadline, to which Chase agreed. The parties
21 subsequently filed a stipulated request to further extend Defendant’s time to respond to the
22 Complaint, accompanied by a declaration from counsel pursuant to the Court’s rules. The
23 Court denied the stipulated request, giving rise to the present order to show cause.

24 This Court should not dismiss the Complaint because the facts underlying this civil
25 suit stand unchanged. As detailed in the Complaint, it is indisputable that a fraudulent check
26 was deposited into Defendant’s account; Defendant withdrew substantial amounts of such
27 deposited funds from his account, leaving a significantly overdrawn balance on the account;
28 and Defendant contractually agreed to be responsible for any such overdrawn balance.

1 Accordingly, Chase has requested entry of default against Defendant, as it has in several
2 related lawsuits filed in courts across the nation. *See e.g., JPMorgan Chase Bank, N.A. v.*
3 *In and Out Appliances, LLC*, No. 24-24175-Civ-Scola (S.D. Fl. Oct. 28, 2024); *JPMorgan*
4 *Chase Bank, N.A. v. Ikemi*, No. 4:24-cv-04140 (S.D. Tex. Oct. 28, 2024); *JPMorgan Chase*
5 *Bank, N.A. v. Rieves*, No. 1:24-cv-04913-TWT, (N.D. Ga. Oct. 28, 2024). Defendant has
6 not secured any civil counsel to date and has not appeared in the above-captioned action by
7 his deadline to do so.

8 Chase reiterates its regret for any inconvenience caused to the Court and respectfully
9 requests that the Court maintain this action on the docket so that Chase can obtain a default
10 judgment against Defendant.

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12 Dated: April 7, 2025

GREENBERG TRAURIG, LLP

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14 By: /s/ Loyal Bishara

Loyal Bishara

Attorneys for Plaintiff JPMorgan Chase Bank, N.A.