

**STATE OF MICHIGAN  
IN THE [REDACTED] DISTRICT COURT**

VELOCITY INVESTMENT LLC,

Plaintiff,

v.

Case No.: 2024-[REDACTED] GC

[REDACTED]

Hon. [REDACTED]

Defendant.

[REDACTED]

Third-Party Plaintiff,

v.

UPSTART NETWORK, INC.; and  
WILMINGTON SAVINGS FUND SOCIETY,  
FSB as TRUSTEE OF ALTERNATE  
LENDINGS HOLDINGS TRUST II,

Third-Party Defendants.

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*Counsel for* [REDACTED]

*Counsel for Wilmington Savings Fund Society  
FSB as Trustee of Alternative Lending Holdings  
Trust II*

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**WILMINGTON'S MOTION FOR EXTENSION OF TIME  
TO RESPOND TO [REDACTED]'S THIRD-PARTY COMPLAINT**

Third-Party Defendant Wilmington Savings Fund Society FSB as Trustee of  
Alternative Lending Holdings Trust II ("Wilmington"), by counsel, respectfully requests  
that the Court extend the time it has to respond to Third-Party Plaintiff [REDACTED]

██████████”) Third-Party Complaint by 14 days, up to and including February 7, 2025. In support of this motion, Wilmington states as follows:

1. On or about October 21, 2024, ██████████ filed his Third-Party Complaint. On December 13, 2024, although Wilmington had not been served, ██████████ filed a Default and Request and Entry against Wilmington.

2. On January 6, 2025, the Court heard ██████████’s request for default. At the hearing, counsel for ██████████ withdrew the request for default. The Court then entered a stipulated order extending time for Wilmington to respond to ██████████’s Third-Party Complaint, to January 27, 2025.

3. Wilmington and its counsel have been diligently investigating the allegations and preparing an appropriate response, but require additional time to do so. Accordingly, Wilmington respectfully requests a short extension of time.

4. This request is made in good faith and not for purpose of delay or for any other improper purpose. Granting this extension will not interfere with any case deadlines.

5. Counsel for Wilmington has conferred with ██████████’s counsel, and Verschaeve objects to this request.

WHEREFORE, Third-Party Defendant Wilmington Savings Fund Society FSB as Trustee of Alternative Lending Holdings Trust II respectfully requests that the Court extend the time it has to respond to ██████████ Third-Party Complaint by 14 days, up to and including February 7, 2025.

Respectfully submitted,

WILMINGTON SAVINGS FUND SOCIETY  
FSB AS TRUSTEE OF ALTERNATIVE  
LENDING HOLDINGS TRUST II

By: /s/ Ke Liu  
One of its attorneys

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**CERTIFICATE OF SERVICE**

Ke Liu, an attorney, certifies that on January 24, 2025, he filed the foregoing document with the Clerk of Court via FedEx, and that he also served a copy on all counsel of record via USPS First Class mail.

/s/ Ke Liu