



2. On March 9, 2026, counsel for the Claimants, Robert Simon, was admitted to hospital suffering from an acute attack of Carnitine Palmitoyl Transference Deficiency.
3. On March 24, 2026, Claimants' Counsel notified all counsel of record that he had been discharged from the hospital, that he was slowly recovering, and suggested an extension to file his Reply to the Responses filed in SSI-107 until April 30, 2026.
4. On April 7, 2026, Claimants' Counsel notified all counsel of record that he was slowly recovering and suggested an extension to file his Reply to the Responses filed in SSI-107 by May 7, 2026.
5. No objection by any counsel of record to Claimants' suggested extension has been noted since March 24, 2026, and many responses have been received encouraging Robert Simon "To take as much time as is necessary to recover".
6. Claimants' counsel continues to make progress in his recovery and it now appears that he will return to full function in the near future.
7. Claimants counsel now wishes to formalize his earlier informal request to extend the deadline for filing his Reply to Responses in Support of Claimants' Motion for Summary Judgment from April 13, 2026, to May 7, 2026, and for the Court to set the hearing to consider Claimants' Motion for Summary Judgment vacated from April 24, 2026 by order of this Court entered on March 23, 2026, to a date subsequent to May 7, 2026.

8. Thus, the Claimants respectfully request that the Court extend the deadline for filing Replies to Response to dispositive motions under Paragraph (5) of the Scheduling Order from April 13, 2026, to May 7, 2026.
9. No party has indicated opposition to Claimants' informal request to extend the deadline for its Reply to May 7.
10. Claimants have sent a copy of this Motion to extend the deadline for filing its Reply to all Counsel of record today to formally seek the position of the parties on the preceding proposal.

WHEREFORE, Pre-1906 Claimants respectfully request that the Court amend the Scheduling Order and extend the deadline to reply to responses, oral argument on dispositive motions, and staying further proceedings in SSI 107 pending the Court's ruling on dispositive motions..

Respectfully submitted,

/s/ Robert S. Simon  
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Certificate of Service

I, Robert Simon, hereby certify that a true copy of the Pre-1906 Claimants' Pre-1906 CLAIMANTS' MOTION TO EXTEND THE DISPOSITIVE MOTION DEADLINE AND SCHEDULING ORDER STREAM SYSTEM ISSUE NO. 107

was sent via email to the counsel for parties of record located on the SS-97-107 service list on the Lower Rio Grande Adjudication Website. on April 13, 2026.

/s/ Robert S. Simon