

Art Factory <create.artfactory@gmail.com>

Garsia v. Billy Procida et al.

8 messages

Jason Teele <

Tue, Jul 22, 2025 at 1:54 PM

To: "create.artfactory@gmail.com" <create.artfactory@gmail.com>

Mr. Garsia,

We represent the defendants in the lawsuit you filed in the Bankruptcy Court. I write to request a 3-week courtesy extension of the deadline to respond to your complaint. The current deadline is July 23, and we request to extend the deadline to August 13. This extension is, of course, without prejudice to your rights in the lawsuit. Please let us know as soon as possible if you consent to this extension. Thank you.

Regards,

S. Jason Teele

Member



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Jason Teele <

Tue, Jul 22, 2025 at 4:56 PM

To: "create.artfactory@gmail.com" <create.artfactory@gmail.com>

Mr. Garsia,

The courtesy of a response would be appreciated.

[Quoted text hidden] [Quoted text hidden]

Wed, Jul 23, 2025 at 6:22 AM

Mr. Teele,

I note that you did not identify which specific defendants you represent in this matter. As Sills Cummis & Gross P.C. and Michael R. Leighton, Esq. are named defendants in this action, please clarify:

- 1. Which defendants you represent
- 2. Whether your firm has withdrawn as counsel for any parties due to conflicts of interest
- 3. Whether all defendants you claim to represent have been properly served

I cannot consent to extensions for defendants who have not been properly served or who have not clearly retained counsel.

Please provide signed return receipts and clear identification of your clients.

David J. Garsia Pro Se Plaintiff [Quoted text hidden]

Schedule your tour

 Wed, Jul 23, 2025 at 8:03 AM

Mr. Garcia,

Sills represents the following defendants:

- William (Billy) Procida
- Derek Weissman
- Dino Tomassetti
- · Ron Simoncini
- · Charles Florio
- Andrew Kovar
- Mario Procida

- · Peter Procida
- 100 Mile Fund, LLC
- 100 Mile REIT Inc.
- 100 Mile Renard Totowa LLC
- Spruce Street Partners LLC
- 468 Totowa Owner, LLC
- Sills Cummis & Gross P.C.

We are not contesting service.

We filed a motion with the court yesterday to extend the deadline. I saw the filed stipulations with the other defendants extending the deadline by consent. Please confirm today if you consent to extend the answer deadline to August 13 for the defendants listed above and we will withdraw the motion.

Regards,

S. Jason Teele, Esq.
Member
Sills Cummis & Gross P.C.
Tel.
Cell.

From: Art Factory <create.artfactory@gmail.com>

Sent: Wednesday, July 23, 2025 6:22:38 AM

To: Jason Teele < > Subject: Re: Garsia v. Billy Procida et al.

*** External Email ***

[Quoted text hidden]
[Quoted text hidden]
[Quoted text hidden]

Art Factory <create.artfactory@gmail.com> To: Jason Teele

Wed, Jul 23, 2025 at 11:46 AM

Mr. Teele,

I consent to the August 13 extension for the defendants listed, without prejudice to all rights and defenses.

However, I note the potential for conflicts of interest in your firm's representation of both Sills Cummis & Gross P.C. and the other named defendants. Please confirm that all clients have provided informed written waivers of any such conflicts, or advise if separate counsel will be entering appearances.

Respectfully,

David J. Garsia Pro Se Plaintiff

[Quoted text hidden]

Schedule your tour



Wed, Jul 23, 2025 at 11:59 AM

To: Art Factory <create.artfactory@gmail.com>

Thank you for your courtesy. Attached is a stipulation extending the deadline. It is substantively identical to the stipulations you approved with other defendants. Please confirm as soon as possible if we can file this with the court.

Regards,

S. Jason Teele

Member







[Quoted text hidden]



Garsia - Stipulation Extending Answer Deadline.pdf 6K

Art Factory <create.artfactory@gmail.com> To: Jason Teele <

Wed, Jul 23, 2025 at 12:52 PM

Mr. Teele,

The stipulation is acceptable. You may file it with the court.

David J. Garsia Pro Se Plaintiff [Quoted text hidden] **Schedule your tour**

Wed, Jul 23, 2025 at 1:10 PM

Jason Teele < > > To: Art Factory < create.artfactory@gmail.com >

Thank you, again. Attached is a filed copy of the stipulation.

[Quoted text hidden]

Garsia - Stipulation Extending Answer Deadline (Filed).pdf 31K