

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 16-cv-01308-RBJ-KLM

FREE THE NIPPLE – FORT COLLINS, an unincorporated association,  
BRITTANY HOAGLAND, and  
SAMANTHA SIX,

Plaintiffs,

v.

CITY OF FORT COLLINS, COLORADO,

Defendant.

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**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO  
ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS’ COMPLAINT  
AND PLAINTIFFS’ MOTION FOR A PRELIMINARY INJUNCTION**

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Defendant City of Fort Collins, Colorado (“Fort Collins”), by its attorneys, Andrew D. Ringel, Esq., Gillian Dale, Esq., and Christina S. Gunn, Esq., of Hall & Evans, LLC, hereby submits this Unopposed Motion for Extension of Time to Answer or Otherwise Respond to the Plaintiffs’ Complaint (“Complaint”) and Plaintiffs’ Motion for a Preliminary Injunction, as follows:

1. Defendant City of Fort Collins, Colorado, was served with a summons and the Plaintiffs’ Complaint on June 21, 2016. [ECF 11.] Accordingly, pursuant to the applicable Federal Rules of Civil Procedure, Defendant’s response to the Plaintiffs’ Complaint is due on July 12, 2016. [See ECF 11.]

2. On the same date, Defendant City of Fort Collins, Colorado received notice Plaintiffs filed a Motion for Preliminary Injunction on May 31, 2016. [ECF 2.]

3. The undersigned counsel was recently retained to represent the Defendant and needs additional time to investigate the Plaintiffs' allegations, gather and evaluate existing documentation, and consult with the Defendant to determine an appropriate strategy prior to responding to the Plaintiffs' Complaint and Plaintiffs' Motion for Preliminary Injunction.

4. Accordingly, Defendant City of Fort Collins, Colorado requests an extension of 21 days until and including August 2, 2016, to answer or otherwise respond to the Plaintiffs' Complaint and to respond to the Plaintiffs' Motion for Preliminary Injunction. No party will be prejudiced by this brief extension of time.

5. Pursuant to D.C.COLO.LCivR 7.1(A), prior to filing the instant Motion, the undersigned counsel conferred with counsel for the Plaintiffs, David Lane, Esq. Mr. Lane indicated the Plaintiffs do not object to this Motion.

6. Pursuant to D.C.Colo.LCivR 6.1(C) a copy of this motion has been served on the undersigned's client as indicated on the certificate of service.

WHEREFORE, Defendant City of Fort Collins, Colorado, respectfully requests this Court extend the deadline for this Defendant to answer or otherwise respond to the Plaintiffs' Complaint and Jury Demand and to respond to the Plaintiffs' Motion for Preliminary Injunction for 21 days until and including August 2, 2016, and for all other and further relief as this Court deems just and appropriate.

Dated this 8th day of July, 2016.

Respectfully submitted,

s/ Andrew D. Ringel

Andrew D. Ringel, Esq.

Gillian Dale, Esq.

Christina S. Gunn, Esq.

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**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on this 8<sup>th</sup> day of July, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

David A. Lane, Esq.  
[dlane@kln-law.com](mailto:dlane@kln-law.com)

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and I hereby certify that I have mailed or served the document or paper to the following non CM/ECF participants in the manner indicated by the non-participant's name:

Carrie Daggett, Esq. (via electronic mail)  
City Attorney  
City of Fort Collins

s/ Nicole Marion, Legal Assistant to  
Andrew D. Ringel, Esq.  
Gillian Dale, Esq.  
Christina S. Gunn, Esq.  
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