

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 16-cv-1308-RBJ-KLM

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

Plaintiffs,

v.

CITY OF FORT COLLINS, COLORADO,

Defendant.

**UNOPPOSED MOTION FOR EXTENSION TO FILE PLAINTIFFS' REPLY TO
DEFENDANT'S RESPONSE TO PLAINTIFFS' MOTION FOR PRELIMINARY
INJUNCTION AND RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

Plaintiffs, by and through their attorneys, David A. Lane and Andy McNulty, of KILLMER, LANE & NEWMAN, LLP, hereby submit the following Unopposed Motion for Extension of Time to File Plaintiffs' Reply to Defendant's Response to Plaintiffs' Motion for Preliminary Injunction and Response to Defendants' Motion to Dismiss, and state as follows:

1. Plaintiffs' Reply to Defendant's Response to Plaintiffs' Motion for Preliminary Injunction is currently due on or before August 19, 2016, inclusive of three days for service.
2. Plaintiffs' Response to Defendants' Motion to Dismiss is currently due on or before August 26, 2016, inclusive of three days for service.
3. Counsel for Plaintiffs have been diligently working on both motions, but require additional time, up to and including September 2, 2016.

4. The length of Defendant's Response to Plaintiffs' Motion for Preliminary Injunction and Motion to Dismiss necessitates that Plaintiffs' counsel spend additional time replying and responding.

5. No party will be prejudiced by the relief sought herein.

CERTIFICATION PURSUANT TO D.C.COLO. LCivR. 7.1

6. Counsel for Plaintiffs, Andy McNulty, hereby certifies that she conferred with counsel for Defendant, Gillian Dale, via email on August 17, 2016. Defendant does not oppose the relief sought herein.

CERTIFICATION PURSUANT TO D.C.COLO. LCivR. 6.1(c)

9. Counsel for Plaintiffs, Andy McNulty, certifies that a copy of this Motion will be served contemporaneously on Plaintiffs upon the filing of this Motion.

WHEREFORE, Plaintiffs respectfully request that the Court grant their Motion for Extension of Time to File Plaintiffs' Reply to Defendant's Response to Plaintiffs' Motion for Preliminary Injunction and Response to Defendants' Motion to Dismiss, up to and including September 2, 2016, and for any other relief deemed just and proper.

Respectfully submitted this 17th day of August 2016.

KILLMER, LANE & NEWMAN, LLP

s/ Andy McNulty

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