

DISTRICT COURT, LARIMER (FT COLLINS) COUNTY, COLORADO Court Address: 201 Laporte Avenue, Suite 100, Fort Collins, CO, 80521	DATE FILED: January 20, 2017 8:46 AM CASE NUMBER: 2016CV144  <p style="text-align: center;"><b>⚠ COURT USE ONLY ⚠</b></p>
<b>Plaintiff(s)</b> VIRGINIA L FARVER v. <b>Defendant(s)</b> CITY OF FORT COLLINS et al.	
<b>Order: Plaintiff's Unopposed Motion for a Second Enlargement of Time to File a Response to Defendants' Motion for Summary Judgment</b>	

The motion/proposed order attached hereto: GRANTED.

Plaintiff is granted until January 26, 2017 to file a Response. The Reply is due 14 days after the Response is filed.

Issue Date: 1/20/2017



GREGORY M LAMMONS  
 District Court Judge

FILED IN COMBINED COURTS  
LARIMER COUNTY COLORADO

2017 JAN 18 PM 3:35

Small Claims    County Court    District Court  
 Probate Court    Juvenile Court    Water Court

Larimer County, Colorado  
Larimer County Justice Center  
201 La Porte Ave  
Suite 100  
Ft. Collins, CO 80521

Plaintiff: Virginia L. Farver

v

Defendant(s):  
City of Fort Collins,  
the Fort Collins Electric Utility; and  
Does 1 - 100

Attorney or Party Without Attorney: (Name & Address)

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▲ COURT USE ONLY ▲

Case Number: 2016 CV  
144

Div.: 5B Ctrm:

**Plaintiff's unopposed motion for a second enlargement of time to file a response to Defendants' Motion for Summary Judgment**

COMES NOW the Plaintiff and hereby respectfully submits the following unopposed motion for a second enlargement of time to file her response to the Defendants' motion for summary judgment.

1. RULE 121 CERTIFICATION: The Plaintiff hereby advises the Court that she has consulted with the Defendants regarding the relief sought in this motion and that she is authorized to state that Defendants have no objections to the same.
2. Pursuant to the deadlines set at the case management conference in this matter, the Defendants' motion for summary judgment was due on Thursday, December 1, 2016 (along with any cross-motion for summary judgment that the Plaintiff wished to file). Response briefs were due 21 days later, and reply briefs were due 14 days after a response was filed.
3. With the consent of the Plaintiff, the Defendants filed on November 29, 2016 a motion for enlargement of their time to file their motion for summary judgment up to and including December 15, 2016 and for an enlargement of the presumptive page limit to 35 pages (but no more than 9,100 words), which motion the Court approved and so ordered on November 29, 2016.
4. With the consent of the Defendants, the Plaintiff filed on January 4, 2017 Plaintiff's unopposed motion for enlargement of time to file response to Defendants' Motion for Summary

Judgment and for enlargement of the presumptive page limit. The Court issued an order that granted that motion on January 9, 2017.

5. Plaintiff has continued preparing her response to the Defendants' motion. However, Plaintiff has been unavoidably delayed. She has experienced computer difficulties. The Defendants' disclosures which Plaintiff has had only since December 30, 2016 are over 1,000 pages and it is taking longer than expected to review them. There have also been a couple of health issues in Plaintiff's family that have taken up time.

6 Accordingly, the Plaintiff requests that the Court grant a second enlargement of the deadline for the filing of her response to Defendants' Motion for Summary Judgment up to and including January 26, 2017. The reply brief would still be due within 14 days after Plaintiff's response is filed unless further extensions are requested and granted by the Court.

7. This motion is made in good faith. No prejudice should be incurred to any party, as evidenced by the Defendants' consent thereto.

WHEREFORE, the Plaintiff respectfully requests the Court to grant an enlargement of the deadline for filing her response to Defendants' motion for summary judgment to Thursday, January 26, 2017 and for whatever further relief the Court deems just and proper.

DATED this 18th day of January, 2017

Respectfully submitted,



Virginia Farver

Plaintiff