



### CERTIFICATE OF CONFERRAL

Pursuant to C.R.C.P. 121 § 1-15(8), undersigned counsel certifies that he conferred with Mr. Gilmartin who indicated that he favors the relief requested.

1. This matter is set for a two-day trial commencing on August 14, 2017. Accordingly, the proposed Trial Management Order is due on or before July 17, 2017. Mr. Gilmartin has not provided Plaintiffs' counsel with his portion of the Trial Management Order, and he asked for additional time to file the Trial Management Order.

2. Pursuant to the Case Management Order, the parties are required to exchange witness and exhibit lists prior to the pretrial conference, scheduled for July 20, 2017 at 1:00 p.m.

3. The parties previously agreed to exchange witness and exhibit lists on July 19, 2017.

4. Plaintiffs request a brief extension of time, through and including July 19, 2017, in which to file the proposed Trial Management Order so that they can add Mr. Gilmartin's additions to the Trial Management Order. Further, the additional time will allow the parties to file their respective witness and exhibit lists with the proposed Trial Management Order in accordance with C.R.C.P. 16(f).

5. The requested enlargement is not requested for any improper purpose and will not prejudice the Defendant in this matter.

WHEREFORE, Plaintiffs respectfully request an enlargement of time, through and including, Wednesday, July 19, 2017, to file a proposed Trial Management Order. A proposed order is filed herewith for the Court's convenience.

Respectfully submitted this 17th day of July, 2017.

IRELAND STAPLETON PRYOR & PASCOE, PC

Signed original on file at the office of  
Ireland Stapleton Pryor & Pascoe, PC

*/s/ Benjamin J. Larson*

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Kelley B. Duke, #35168

Benjamin J. Larson, #42540

*Special Counsel for the City of Fort Collins*

*Attorneys for Poudre Fire Authority*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 17<sup>th</sup> day of July, 2017, a true and correct copy of the foregoing **PLAINTIFFS' UNOPPOSED MOTION FOR TWO-DAY ENLARGEMENT OF TIME TO FILE [PROPOSED] STIPULATED TRIAL MANAGEMENT ORDER** was served via U.S. Postal Service, first class mail, postage prepaid and addressed as follows:

Keith Gilmartin  
3316 W. Vine Drive  
Fort Collins, CO 80521

And served via email to:  
[keithgil2@gmail.com](mailto:keithgil2@gmail.com)

*SIGNED ORIGINAL ON FILE AT THE OFFICE OF  
IRELAND STAPLETON PRYOR & PASCOE, PC*

*/s/ Hannah Pick*

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Hannah Pick