

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 17-CV-01177-LTB-NYW

DAKOTA TYLER MCGRATH,

Plaintiff,

v.

FORT COLLINS POLICE SERVICES OFFICER NICK RODGERS, in his individual
capacity,

Defendant.

**PLAINTIFF'S UNOPPOSED MOTION FOR 14-DAY
EXTENSION OF TIME, UNTIL JULY 11, 2018, TO RESPOND
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, Dakota McGrath, by and through counsel, Anthony Viorst of the Viorst Law Offices, P.C., hereby moves for a 14-day extension of time, until July 11, 2018, to file a Response to Defendant's Motion for Summary Judgment, and states as follows:

Certification

Undersigned counsel certifies that he has conferred with opposing counsel, Matthew Hegarty, and that he does not oppose the instant motion.

1. Defendant filed his Motion for Summary Judgment on June 6, 2018. Plaintiff's response is due June 27, 2018.
2. The Plaintiff unexpectedly passed away on May 21, 2018.
3. Due the complicated nature of this case and the Plaintiff's unexpected death compounding the complexity, Plaintiff's counsel requests an additional 14-day extension of time to complete a response.
4. It is stipulated that Defendant's reply deadline will also be extended by two weeks, until July 25, 2018.

WHEREFORE, for the foregoing reasons, Plaintiff moves for an unopposed 14-day extension of time, until July 11, 2018 to file a response to Defendant's Motion for Summary Judgment.

Dated this 22nd day of June, 2018.

THE VIORST LAW OFFICES, P.C.

[Original signature on file at Viorst Law Offices, P.C.]

s/ Anthony Viorst

Anthony Viorst, #18508
Viorst Law Offices, PC
950 South Cherry Street, Suite 300
Denver, CO 80246
Telephone: (303) 759-3808
Facsimile: (303) 333-7127
E-mail: tony@hssspc.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of June, 2018, I electronically filed a true and correct copy of the above and foregoing **PLAINTIFF'S UNOPPOSED MOTION FOR 14-DAY EXTENSION OF TIME, UNTIL JULY 11, 2018, TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following e-mail address(es):

Matthew J. Hegarty, Esq.
Thomas J. Lyons, Esq.
Hall & Evans, LLC
1001 Seventeenth Street, Suite 300
Denver, CO 80202

[Original signature on file at Viorst Law Offices, P.C.]

s/ Michelle Spadavecchia

Legal Assistant