

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 18-cv-03204-NRN

LORI FRANK,

Plaintiff,

v.

CITY OF FORT COLLINS, a municipality;
TERENCE F. JONES, former Interim Chief of Police, in his individual capacity; and
JEROME SCHIAGER, former Deputy Chief of Police, in his individual capacity,

Defendants.

**DEFENDANT SCHIAGER'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE RESPONSE TO COMPLAINT**

Defendant JEROME SCHIAGER, former Deputy Chief of Police, hereby moves this Court for an order extending the time through and including January 31, 2019, to file an answer, motion, or other responsive pleading and, as grounds therefor, states the following:

CERTIFICATION

Pursuant to D.C.COLO.LCivR 7.1(a), Defendant Schiager's counsel has conferred with Plaintiff's counsel. Defendant Schiager's counsel certifies that Plaintiff has no objection to this motion.

Pursuant to D.C.COLO.LCivR 6.1(c), Defendant Schiager's counsel is providing a copy of this motion to his client, as set forth in the certificate of service below.

MOTION

1. Defendant Schiager's answer or other response is purportedly due on January 4, 2019.

2. Undersigned counsel confirmed on January 3, 2019, that he has been retained to defend Mr. Schiager. He was able to speak with Mr. Schiager for the first time on January 3.

3. Undersigned counsel needs to meet in person with Mr. Schiager and obtain materials relating to this matter to prepare an appropriate defense.

4. Defendant Schiager requests an extension of time through and including January 31, 2019, in which to file an answer, motion, or other responsive pleading.

WHEREFORE, Defendant Schiager requests that the Court issue an order granting him an extension of time through and including January 31, 2019, in which to file an answer, motion, or other responsive pleading in this action.

Respectfully submitted,

Date: 01/03/19

s/ David R. DeMuro

David R. DeMuro
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ATTORNEY FOR DEFENDANT SCHIAGER

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January, 2019, 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:

Jennifer Robinson

jrobinson@raemployment.com

Cathy Havener Greer

cgreer@warllc.com; bmccall@warllc.com; pcallies@warllc.com

and I hereby certify that the foregoing is being served via private email address on the following:

Jerome Schiager

[by email]

s/ David R. DeMuro

David R. DeMuro