

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:18-cv-03204-RBJ

LORI FRANK,

Plaintiff,

vs.

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.

**PLAINTIFF’S PARTIAL UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT’S FIRST SET OF DISCOVERY REQUESTS**

Plaintiff, Lori Frank, through her undersigned counsel, hereby requests an extension of time until July 10, 2019 to submit her Response to Defendants’ First Set of Interrogatories and Requests for Production of Documents. As grounds Plaintiff states as follows:

1. On May 24, 2019 Defendant’s submitted their first set of discovery requests to Plaintiff’s and Plaintiff submitted her first set of discovery to Defendant, City of Fort Collins.
2. The Parties’ responses are due June 24, 2018.
3. On June 21, 2019 Defendant’s filed a Motion for a one-week extension to respond to Plaintiff’s discovery.
4. Defendant’s stated in their Motion that “As a courtesy, the City would not oppose a similar one-week extension on Plaintiff’s deadline to respond to Defendant’s discovery requests.”.
5. Counsel for Plaintiff has conferred with Counsel for Defendants regarding an extension of time until July 10, 2019 for Plaintiff to respond to Defendant’s discovery requests.

6. Counsel for Defendant's did not respond regarding the extension until July 10, 2019 for Plaintiff to respond to Defendants' discovery requests.

7. Counsel for Plaintiff is currently out of the office and will not return until July 5, 2019 and will be unable to complete Plaintiff's discovery responses until her return. Plaintiff hereby requests an extension of time until July 10, 2019 in order to prepare Plaintiff's responses to Defendant's discovery requests.

8. Plaintiff's requests an extension of time will not cause undue delay and no party will be prejudiced should the requested relief be granted.

WHEREFORE, Plaintiff respectfully requests that the Court grant her motion and extend the deadline for her to respond to Defendants' First Set of Interrogatories and Requests for Production of Documents, up to and including July 10, 2019.

RESPECTFULLY SUBMITTED this 24th day of June 2019.

ROBINSON & ASSOCIATES LAW OFFICE, LLC

s/Jennifer Robinson

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ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2019, a true and correct copy of the above and foregoing **PLAINTIFF'S PARTIAL UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S FIRST SET OF DISCOVERY REQUESTS** was electronically filed using the CM/ECF system, which will send notification of such filing to the following email addresses:

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