

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 1:17-CV-00884-CMA-STV

CHAYCE AARON ANDERSON,

Plaintiff,

vs.

JASON SHUTTERS,

Defendant.

**JOINT MOTION FOR LEAVE TO AMEND DEADLINES
IN THE SCHEDULING ORDER**

The Parties respectfully request that this Court grant leave to amend the expert disclosure and close of discovery deadlines in the Scheduling Order (ECF No. 103). In support of this request, the undersigned represents that the Parties conferred on this matter and have no objections pursuant to D.C.COLO.LCivR 7.1(a).

The Parties have been proceeding under the Scheduling Order. Due to unforeseen scheduling conflicts and because the parties are continuing to work together to complete written discovery, the Parties respectfully request additional time to meet the discovery and dispositive motion deadlines. The Parties also respectfully request to reschedule the final pretrial conference to accommodate the additional time sought to meet the discovery and dispositive motion deadlines. This is the first motion for an extension of time in the present case by either Party. Accordingly, the Parties respectfully request that the current deadlines be extended by forty-five (45) days as follows:

The Discovery Cut-off shall be **April 4, 2019** (extended from February 18, 2019);

The Dispositive Motion Deadline shall be **May 2, 2019** (extended from March 18, 2019);

Plaintiff shall designate all experts and provide opposing counsel with all information specified in Fed. R. Civ. P. 26(a)(2) on or before **February 1, 2019** (extended from December 18, 2018);

Defendant shall designate all experts and provide opposing counsel with all information specified in Fed. R. Civ. P. 26(a)(2) on or before **March 4, 2019** (extended from January 18, 2019);

The Parties shall designate rebuttal experts on or before **March 18, 2018** (extended from February 1, 2019);

The Deadline for Interrogatories shall be **March 4, 2019** (extended from January 18, 2019);

The Deadline for Requests for Production of Documents and/or Admissions shall be **March 4, 2019** (extended from January 18, 2019);

Defendant shall respond to Plaintiff's First Set of Requests for Production no later than **January 27, 2019** (extended from December 13, 2019);

Plaintiff shall respond to Defendant's First Set of Written Discovery no later than **January 28, 2019** (extended from December 14, 2018); and

The final pretrial conference shall be held in this case on a date at the Court's convenience (extended from May 13, 2019).

WHEREFORE, the parties respectfully request that this Court grant the Motion for Leave to Amend Discovery Deadlines in the Scheduling Order.

Dated this 12th day of December, 2018.

/s/ Christopher Casolaro

Christopher Casolaro

Travis Jordan

Ll. Rhyddid Watkins

Heather Campbell Burgess

FAEGRE BAKER DANIELS LLP

1700 Lincoln Street, Suite 3200

Denver, Colorado 80203

Telephone: (303) 607-3500

Facsimile: (303) 607-3600

christopher.casolaro@faegrebd.com

travis.jordan@faegrebd.com

rhyddid.watkins@faegrebd.com

heather.burgess@faegrebd.com

Attorneys for Plaintiff

/s/ Mark Ratner

Mark S. Ratner, Esq.

HALL & EVANS, L.L.C.

1001 Seventeenth Street, Suite 300

Denver, Colorado 80202

ratnerm@hallevans.com

Attorney for Defendant

CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on this 12th day of December 2018, I filed the foregoing **JOINT MOTION FOR LEAVE TO AMEND DEADLINES IN THE SCHEDULING ORDER** via the Court's electronic filing system, which shall serve notice to:

Mark S. Ratner, Esq.
HALL & EVANS, L.L.C.
1001 Seventeenth Street, Suite 300
Denver, Colorado 80202
Ratnerm@hallevans.com

s/ Carol Wildt

Legal Administrative Assistant