

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 19-cv-00901-WJM-NRN

MICHAELLA LYNN SURAT,

Plaintiff,

v.

RANDALL KLAMSER, in his individual capacity

Defendant.

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**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

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Defendant RANDALL KLAMSER, in his individual capacity, by and through his counsel, Mark S. Ratner, Esq., Gillian Dale, Esq., and Brenden Desmond, Esq., of Hall & Evans, L.L.C., hereby submits the following Unopposed Motion for Extension of Time as follows:

**CERTIFICATE OF COMPLIANCE WITH D.C.COLO.LCivR 7.1(A)**

Pursuant to D.C.COLO.LCivR 7.1(A), the undersigned counsel conferred with counsel for Plaintiff. Counsel for Plaintiff does not oppose the relief sought in this Motion.

1. The scheduling order in this matter provides for a March 6, 2020 deadline for Defendant's expert disclosures. (ECF No. 61).

2. Due to the voluminous nature of the information in this matter, the Defendant requires an additional 7 days for disclosure of his experts.

3. The parties are continuing to engage in discovery, including depositions and document production. A 7-day extension of time will not interfere with the on-going discovery of this matter.

4. Pursuant to D.C.Colo.LCiv.R. 6.1(c), the undersigned counsel has served their client's representative with a copy of this Motion as reflected on the accompanying certificate of service.

5. WHEREFORE, for all the foregoing reasons, Defendant respectfully requests an extension of time until March 13, 2020, to complete his expert disclosures, and for entry of all other relief as this Court deems just and appropriate.

Dated this 6th day of March, 2020.

Respectfully submitted,

s/ Mark Ratner

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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE (CM/ECF)**

I HEREBY CERTIFY that on the 6th day of March, 2020, 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:

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***Attorneys for Plaintiff***

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