

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

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

LORI FRANK,

Plaintiff,

vs.

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

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME UNDER FED. R. CIV. P. 30(e)
FOR REVIEW AND SIGNING OF DEPOSITION TRANSCRIPT**

Defendant City of Fort Collins, by its counsel, requests an extension of the deadline for review and signing of the deposition transcript of Teresa Roche from December 16, 2019 to January 16, 2020, and as grounds for this request states:

1. The deposition of Ms. Roche was taken November 7, 2019.
2. The court reporter sent the transcript of the Roche deposition and related exhibits to the Fort Collins City Attorney on November 15, 2019.
3. Ms. Roche underwent surgery on November 20, 2019 and will be on medical leave through late January 2020.
4. Ms. Roche requires additional time beyond the normal 30 days permitted in Fed. R. Civ. P 30(e) to review her deposition, but intends to complete the review while she is on medical leave.

5. No party will be prejudiced by this extension of time. The City has not requested a similar extension of time for any other deponent to review her deposition transcript.

6. Plaintiff's counsel does not oppose this request.

WHEREFORE, Defendant City of Fort Collins respectfully requests an extension of time to and including January 16, 2020 for Teresa Roche to review and sign the transcript to her deposition, and for such other relief as this Court deems proper.

Dated this 21st day of November, 2019.

Respectfully submitted,

S/Cathy Havener Greer

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Attorneys for Defendant City of Fort Collins

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 21, 2019, a true and correct copy of the above and foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME UNDER FED. R. CIV. P. 30(e) FOR REVIEW AND SIGNING OF DEPOSITION TRANSCRIPT** was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following email addresses

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