

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

Civil Action No. 1:18-cv-03112-RBJ-STV

SEAN SLATTON,

Plaintiff,

v.

TODD HOPKINS, in his individual capacity,
BRANDON BARNES, in his individual capacity,
JOHN HUTTO, in his individual capacity,
CITY OF FORT COLLINS, a municipality,

Defendants.

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE TO FILE CONSOLIDATED
RESPONSE TO MOTIONS TO DISMISS [DOCS. 96 & 98]**

Plaintiffs, through counsel, David Lane and Helen Oh of KILLMER, LANE, NEWMAN, LLP, hereby submit the following Unopposed Motion for Leave for Plaintiffs to file a single, consolidated response to Defendants' Motions to Dismiss [Docs. 96 & 98], and state as follows:

1. On January 13, 2020, Defendant Todd Hopkins filed a Motion to Dismiss Plaintiff's Fourth Amended Complaint [Doc. 96].
2. On January 16, 2020, Defendants Brandon Barnes, John Hutto, and City of Fort Collins filed a Motion to Dismiss Plaintiff's Fourth Amended Complaint [Doc. 98].
3. Plaintiff's responses to these two motions are due on February 3, 2020 and February 6, 2020, respectively.
4. Plaintiff respectfully requests leave to file a single consolidated response to these two motions to dismiss which are 28 pages in length, to be due on February 6, 2020.

5. Filing a consolidated response is a more efficient way to address the arguments raised in Defendants' motions to dismiss than filing separate responses because there is some overlap between the issues raised in those motions.

6. Plaintiff requires up to 28 pages to respond to the motions to dismiss because of the particular complexity of the legal issues raised in the pending motions, the number of legal claims at issue, and the number Defendants.

7. If Plaintiff responded to these motions to dismiss separately, they would be allowed up to 15 pages per response, a total of 30 pages. In the interests of judicial economy, the consolidated response will be no longer than 28 pages, shorter than this Court's practice standard limitation that would collectively apply to two responses.

8. No party will be prejudiced by the relief sought herein.

CERTIFICATION PURSUANT TO D.C.COLO.LCivR. 7.1

Counsel for Plaintiff, Helen Oh certifies that she conferred with counsel for Defendants regarding the relief requested herein. None of the Defendants oppose the relief.

CONCLUSION

WHEREFORE Plaintiff respectfully requests that the Court to grant leave for Plaintiff to file a single response to Defendants' Motions to Dismiss [Docs. 96 & 98], with a deadline of February 6, 2020, totaling no more than 28 pages, and for any other relief deemed just and proper.

DATED this 28th day of January 2020.

KILLMER, LANE & NEWMAN, LLP

s/ Helen Oh

Helen Oh
David Lane

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2020, I filed the foregoing via the CM/ECF system, which will send notice to the following:

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