

**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,
BRANDON BARNES,
JOHN HUTTO,
CITY OF FORT COLLINS
Defendants.

**DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO
SUBMIT REPLY BRIEFS IN SUPPORT OF THEIR MOTIONS TO DISMISS [ECF 96 &
98]**

The Defendants, by and through their respective counsel, hereby submit their Unopposed Joint Motion for Extension of Time to Submit Reply Briefs in Support of their Motions to Dismiss, and in support thereof states as follows:

1. The Defendants' current deadline to submit their reply briefs in support of their motions to dismiss is March 16, 2020.
2. The undersigned has conferred with counsel for the Plaintiff, who does not oppose the relief sought in this Motion.
3. Unfortunately the March 2, 2020 filing of Plaintiff's response brief fell during a particularly busy time for the undersigned. In addition to preparing for a final pre-trial conference in an ADA case in front of Judge Wang, the undersigned had to travel to Lamar, CO

for another case this week. As a result, the undersigned has not had sufficient time to prepare a reply to Plaintiff's thirty-page response, nor confer with the undersigned's client.

4. The undersigned thus requests a one-week extension, up through and including March 23, 2020, in which to submit a reply brief.

5. This is the first request by Defendants for an extension of time and no parties will be prejudiced by the relief sought in this Motion.

6. On behalf of Brandon Barnes, John Hutto, and the City, Mr. Ratner requests a similar extension and joins in the relief sought in this Motion.

7. The undersigned certifies that the undersigned has served a copy of this Motion on Officer Hopkins. Mr. Ratner certifies that a copy has been served on his clients.

Wherefore, the Defendants respectfully request an extension, up to and including March 23, 2020, in which to submit reply briefs in support of ECF 96 and ECF 98.

Respectfully submitted this 12th day of March, 2020.

s/Nick Poppe

Marni Nathan Kloster
Nicholas C. Poppe
NATHAN DUMM & MAYER P.C.
7900 E. Union Avenue, Suite 600
Denver, CO 80237-2776
Phone Number: (303) 691-3737
Fax: (303) 757-5106
Attorneys for Defendant Todd Hopkins

- AND -

/s/ Mark S. Ratner

Mark S. Ratner

Hall & Evans, L.L.C.

1001 17th Street, Suite 300

Denver, CO 80202

Phone: 303-628-3300

Fax: 303-628-3368

ratnerm@hallevans.com

*ATTORNEYS FOR DEFENDANTS DEFENDANT
BARNES, JOHN HUTTO, AND THE CITY OF
FORT COLLINS*

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of March, 2020, I electronically filed the foregoing **DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO SUBMIT REPLY BRIEFS IN SUPPORT OF THEIR MOTIONS TO DISMISS [ECF 96 & 98]** with the **MOTION FOR EXTENSION** Clerk of Court using the CM/ECF system which will send notification of such filing to the following at their e-mail addresses:.

David A. Lane
KILLMER, LANE & NEWMAN, LLP
dlane@kln-law.com
ATTORNEYS FOR PLAINTIFFS

Mark Scott Ratner
Hall & Evans LLC-Denver
ratnerm@hallevans.com
ATTORNEY FOR DEFENDANT CITY OF FORT COLLINS, BARNES AND HUTTO

S/Nick Poppe

Marni Nathan Kloster
Nicholas C. Poppe
Attorney for Defendants
NATHAN DUMM & MAYER P.C.
7900 E. Union Avenue, Suite 600
Denver, CO 80237-2776
Phone Number: (303) 691-3737
Facsimile: (303) 757-5106
MNathan@ndm-law.com