


LARIMER COUNTY DISTRICT COURT 201 LAPORTE AVENUE, SUITE 100 FORT COLLINS, COLORADO 80521	<p style="text-align: center;"><b>GRANTED BY COURT</b></p> <p style="text-align: center;"><b>05/27/2020</b></p> <p>DATE FILED: May 27, 2020 3:54 PM          CASE NUMBER: 2019CV30889</p>  <p style="text-align: center;"><b>JULIE KUNCE FIELD</b>          District Court Judge</p>
Appeal from the Fort Collins Municipal Court The Honorable Judge Kathleen M. Lane Case No. 2018-0240752-MD	
Defendant-Appellant:  ADAM WIEMOLD  v.  Plaintiff-Appellee:  PEOPLE OF THE STATE OF COLORADO	<p style="text-align: center;">COURT USE ONLY</p>
Adam Frank FRANK AND SALAHUDDIN LLC 1741 High Street, Denver, CO 80218 adam@fas-law.com Phone: 303-974-1084 Fax: 303-974-1085 Attorney Registration Number: 38979 In cooperation with the ACLU of Colorado	
<p style="text-align: center;"><b>UNOPPOSED MOTION FOR 21-DAY EXTENSION OF TIME TO FILE REPLY BRIEF</b></p>	

Mr. Wiemold, through counsel, requests that this Court grant him a 21-day extension of time to file his reply brief. Mr. Wiemold has conferred with counsel for the City of Fort Collins concerning this request, and the City does not object to the requested relief. As grounds, he states the following:

1. This case is not the typical appeal of a municipal court conviction. As the Court has seen, this appeal raises multiple complex constitutional issues of first impression in Colorado. As a result, briefing in this case requires significantly more time and effort than the typical appeal from municipal court.
2. Acknowledging this, the parties have cooperated with each other, not objecting to extensions of time for filing briefs from the default deadlines contained in Crim. P 37. Similarly, the City does not object to the relief requested herein.
3. While Mr. Wiemold's Opening Brief was 22 pages, the City's Answer Brief was 46 pages. Responding to the arguments contained in this brief is a time-consuming task.
4. Because of the upheaval caused by the COVID-19 pandemic, counsel for Mr. Wiemold has had to drastically change childcare arrangements, involving significantly increased amounts

of time where counsel's children are home during the day. Given this, it is more difficult for Mr. Wiemold's counsel to dedicate the time required to address the issues in this appeal than it would be under normal circumstances.

Wherefore, Mr. Wiemold asks that this Court grant him a 21-day extension to file the reply brief in this case up to and including June 24, 2020.

Dated: May 27, 2020



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Adam Frank, #38979

FRANK & SALAHUDDIN LLC

In Cooperation with the ACLU of Colorado

## Certificate of Service

I hereby certify that on May 27, 2020, I served a true and correct copy of the foregoing electronically via the CCE e-filing system upon the trial court, as well as the following individuals, either directly through CCE or via email:

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