

DISTRICT COURT, LARIMER COUNTY, COLORADO

DATE FILED: February 24, 2020 3:02 PM  
FILING ID: 183D3FDA52E4A  
CASE NUMBER: 2020CV115

Larimer County Justice Center  
201 Laporte Avenue, Suite 100  
Fort Collins, CO 80521-2761  
(970) 498-6100

**Plaintiff: STACY LYNNE**

**v.**

**Defendants:  
NOAH BEALS, CITY OF FORT COLLINS**

COURT USE ONLY

Andrew W. Callahan, #52421  
WICK & TRAUTWEIN, LLC  
P.O. Box 2166  
Fort Collins, CO 80522  
Phone: (970) 482-4011  
Email: [acallahan@wicklaw.com](mailto:acallahan@wicklaw.com)

Case Number: 2020 CV 115

Courtroom: 5A

**DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME TO FILE RESPONSIVE PLEADING**

**COMES NOW**, the Defendants, Noah Beals and the City of Fort Collins, by and through counsel, Wick & Trautwein, LLC, and respectfully submits the following unopposed motion for enlargement of time for the defendants to file their responsive pleadings to the Plaintiff's Complaint. In support hereof, Defendants state as follows:

- RULE 121 CERTIFICATION:** Undersigned counsel for the Defendants hereby advises the Court that he has conferred with Plaintiff about the enlargement of time requested in this motion. Undersigned counsel is authorized to state that Plaintiff has consented to the relief requested herein.
- Defendants' were served with the Complaint on or about February 14, 2020, which would make their responsive pleading due on March 6, 2020. Defendants seek an enlargement of time up to and including March 27, 2020, for all defendants to file a responsive pleading in this case.
- This motion is made in good faith and in cooperation with other parties in this case. No prejudice should be incurred to any party, as reflected by the consent and agreements described above.

Respectfully submitted this 24<sup>th</sup> day of February, 2020.

WICK & TRAUTWEIN, LLC

By: s/Andrew W. Callahan  
Andrew W. Callahan, #52421  
Attorneys for Defendants

**CERTIFICATE OF ELECTRONIC FILING**

The undersigned hereby certifies that a true and correct copy of the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING** was filed via the Colorado Courts E-Filing System and served this 24<sup>th</sup> day of February, 2020, on the following:

Stacy Lynne  
305 West Magnolia Street #282  
Fort Collins, CO 80521

Served via email to [stacy\\_lynne@comcast.net](mailto:stacy_lynne@comcast.net) & U.S. Mail.

s/ Jody L. Minch

*[The original certificate of electronic filing signed by Jody L. Minch is on file at Wick & Trautwein, LLC)*