

DISTRICT COURT, LARIMER COUNTY, COLORADO Larimer County Justice Center 201 Laporte Avenue, Suite 100 Fort Collins, CO 80521-2761 (970) 498-6100	DATE FILED: March 23, 2020 3:55 PM FILING ID: D50E0653C7BB6 CASE NUMBER: 2020CV115
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	Case Number: 2020 CV 115 Courtroom: 3B
DEFENDANTS' SECOND 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 Amended Complaint. In support hereof, Defendants state as follows:

1. **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.
2. Plaintiff has filed an Amended Complaint in this matter. Defendants' response to the Amended Complaint is due on or about March 31, 2020. Defendants request an enlargement of time to April 7, 2020 for all defendants to file a responsive pleading in this case.
3. 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 23rd day of March, 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' SECOND UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING** was filed via the Colorado Courts E-Filing System and served this 23rd day of March, 2020, on the following:

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

Served via email to 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)