

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 2, 2020 2:00 PM FILING ID: F634186D6112B CASE NUMBER: 2020CV116
Plaintiff: STACY LYNNE v. Defendants: CITY OF FORT COLLINS: City Manager City Attorney Carrie Daggett, Rachel Askeland (Acting Records Custodian), Karen Burke (Records Custodian)	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 116 Courtroom: 3C
DEFENDANTS' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING	

COMES NOW, the Defendants, the City of Fort Collins, Carrie Daggett, Rachel Askeland and Karen Burke, by and through counsel, Wick & Trautwein, LLC, and respectfully submit 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:

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 is not opposed to the relief requested herein.
2. 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.
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 2nd 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' UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING** was filed via the Colorado Courts E-Filing System and served this 2nd 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)