

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 19-cv-02848-LTB

KIMBERLY CHANCELLOR,

Plaintiff,

v.

CITY OF FORT COLLINS, a municipality, and
STEVEN SPARACIO, in his individual capacity, and

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE DEFENDANT CITY OF
FORT COLLINS' RESPONSE TO PLAINTIFF'S COMPLAINT AND JURY DEMAND**

Defendant City of Fort Collins, by its attorneys, Hall & Evans, L.L.C., hereby moves for an extension of time to submit its Response to Plaintiff Kimberly Chancellor's Complaint and Jury Demand, and states as follows:

1. Certificate of Conferral: Pursuant to D.C.COLO.LCivR 7.1(b)(1), the undersigned conferred with Counsel for Plaintiff who indicate they do not oppose the relief requested herein.
2. On October 4, 2019, Ms. Chancellor filed her Complaint. [Doc. #1].
3. On October 11, 2019 Plaintiff served Defendant City of Fort Collins with the Summons and Complaint. The City of Fort Collins also executed a Waiver of Service on that date.

4. Defendant's response is currently due on December 10, 2019.

5. Defendant respectfully requests a two-day extension of time until December 12, 2019, to submit its response to Plaintiff's Complaint. This extension of time is necessary to properly investigate the factual bases underlying the Plaintiff's Complaint and to confer with the relevant officials from the City of Fort Collins concerning its response. Furthermore, the undersigned counsel requires additional time to analyze the claims and applicable defenses, and to formulate a strategy for Defendant's response.

6. Defendant's request for an extension of time will not delay the proceedings or prejudice the parties as this lawsuit has just commenced.

7. Pursuant to D.C.COLO.LCivR 6.1(b), Defendant states this is the first extension of time requested by Defendant City of Fort Collins in this matter, and no other extension of time has been granted by this Court for either of the other parties.

8. Certificate of Compliance: Pursuant to D.C.COLO.LCivR 6.1(c), a copy of this Motion is being served contemporaneously on John Duval, Esq., Deputy City Attorney for the City of Fort Collins.

WHEREFORE, Defendant City of Fort Collins respectfully requests the Court grant its unopposed motion for extension of time file its response to Plaintiff's Complaint and to extend the date to respond to December 12, 2019.

DATED this 10th day of December 2019.

Respectfully submitted,

s/ Mark S. Ratner

Mark S. Ratner

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**ATTORNEY FOR DEFENDANT
CITY OF FORT COLLINS**

CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on the 10th day of December, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

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