

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

Civil Action No. 19-cv-00901-NRN

MICHAELLA LYNN SURAT,

Plaintiff,

v.

RANDALL KLAMSER, in his individual capacity, and  
CITY OF FORT COLLINS, a municipality,

Defendants.

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**JOINT MOTION TO STAY PRETRIAL ORDER DEADLINE UNTIL  
AFTER A RULING ON THE PENDING MOTIONS**

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Plaintiff and Defendants, through undersigned counsel, file their Joint Motion to Stay Pretrial Order Deadline Until After a Ruling on the Pending Motions, and as grounds therefore, state as follows:

1. On October 19, 2020, Plaintiff filed an unopposed motion for leave to file a consolidated response to Defendants' motion to dismiss and motion for summary judgment, and a motion for extension up to and including November 24, 2020 to file the consolidated response.

[Doc. 120].

3. The pretrial order is currently due on November 11, 2020.

4. In the interest of judicial economy and efficiency for the Parties, the Parties request a stay on the pretrial order for a date to be set by this Court after a ruling has been made on the pending motion to dismiss and motion for summary judgment.

WHEREFORE, the Parties respectfully request that the Court enter the attached Joint Motion to Stay Pretrial Order Deadline Until After a Ruling on the Pending Motions.

**CERTIFICATION PURSUANT TO D.C.COLO. LCivR. 6.1(C)**

5. Counsel for Plaintiff and Defendant certify that this motion will be served contemporaneously on their clients upon the filing of this motion.

Respectfully submitted this 20<sup>th</sup> day of October, 2020.

s/ Helen Oh  
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Helen Oh  
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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I certify that pursuant to Section II.D.2.b. of Hon. William J. Martinez’s Practice Standards a true and correct copy of the above and foregoing was contemporaneously served via email on Plaintiff Michaela Surat.

s/ Jamie Akard  
Jamie Akard

I certify that pursuant to Section II.D.2.b. of Hon. William J. Martinez’s Practice Standards a true and correct copy of the above and foregoing was contemporaneously served via email on Defendants Randall Klamser and Representative of Fort Collins.

s/ Mark Ratner  
Mark Ratner

s/ John Duval  
John Duval