

DISTRICT COURT, COUNTY OF LARIMER,
COLORADO

Larimer County Justice Center
201 Laporte Avenue, Suite 100
Fort Collins, Colorado 80521-2762
(970) 498-6100

Plaintiff: THE CITY OF FORT COLLINS,
COLORADO, a municipal corporation,

v.

Defendants: BOARD OF COUNTY COMMISSIONERS
OF LARIMER COUNTY, COLORADO;
STREETMEDIAGROUP, LLC

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▲ COURT USE ONLY ▲

Case Number: 2020CV030580

Division: 4B

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEF
with proposed Order

Plaintiff City of Fort Collins, by and through its attorneys, Andrew D. Ringel, Esq., of Hall & Evans, L.L.C. and John R. Duval, Esq., Deputy City Attorney, and Claire Havelda, Esq., Assistant City Attorney, of the Fort Collins City Attorney's Office, hereby respectfully submits this Unopposed Motion for Extension of Time to File Reply Brief, as follows:

1. Certificate of Conferral: Pursuant to C.R.C.P. 121(1-15)(8), prior to filing this Motion, the undersigned counsel conferred with counsel for the Defendants. Counsel for Defendant Board of County Commissioners of Larimer County, Frank Haug, Esq., indicated Larimer County does not oppose this Motion. Counsel for Defendant StreetMediaGroup, LLC, Todd Messenger, Esq., indicated StreetMediaGroup, LLC also does not oppose this Motion.

2. Defendant Board of County Commissioners of Larimer County filed its Answer Brief on February 26, 2021. Defendant StreetMediaGroup, LLC filed its Answer Brief on March 2, 2021. Accordingly, because it is appropriate for Plaintiff to file a single Reply Brief addressing all arguments in the two Answer Briefs, pursuant to C.R.C.P. 106(a)(4) and this Court's Briefing Schedule the Plaintiff's Reply Brief is due on or before March 16, 2021. Plaintiff respectfully requests an extension of 7 days until and including March 23, 2021, to file its Reply Brief in this matter.

3. The undersigned counsel, Andrew D. Ringel, Esq., as the primary responsibility for drafting the Reply Brief in this matter. Due to the nature of the arguments to be made in the two Answer Briefs and the need to address all of them in a single brief, the undersigned counsel needs more time to prepare the Reply Brief. Further, the undersigned counsel requires some additional time to complete the Reply Brief in this matter due to the extraordinary press of business respecting the following other commitments:

a. The undersigned counsel previously had, has, and will have the following other commitments in the past 20 days and the next 30 days: (i) four depositions and the associated preparation; (ii) four mediations and the associated preparations; (iii) preparation for and conducting two oral arguments before the United States Court of Appeals for the Tenth Circuit on March 9, 2021; and (iv) various other motions, hearings, conferences, and other similar matters in the many different ongoing litigation matters the undersigned counsel is directly responsible for handling.

4. No party will be prejudiced by this brief extension of time and the requested extension will not unduly disrupt the schedule before this Court.

5. Pursuant to C.R.C.P. 121(1-15)(6), the undersigned counsel has served his client representative with a copy of this Motion.

WHEREFORE, for all the foregoing reasons, Plaintiff City of Fort Collins respectfully requests this Court grant it an extension of seven (7) days until and including March 23, 2021, to file its Reply Brief, and for all other and further relief as this Court deems just and appropriate.

Dated this 11th day of March, 2021.

Respectfully submitted,

/s/ Andrew D. Ringel

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**ATTORNEYS FOR PLAINTIFF
THE CITY OF FORT COLLINS
COLORADO**

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March, 2021, a true and correct copy of the foregoing was filed with the Court and served via Colorado Courts E-Filing System to the following email addresses:

Todd G. Messenger, Esq.
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Amanda C. Jokerst, Esq.
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Jeannine S. Haag, Esq.
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William G. Ressue, Esq.
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Frank N. Haug, Esq.
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and sent the foregoing via email to the following client representative:

Carrie Daggett, Esq.
City Attorney

/s/ Nicole Marion _____
Nicole Marion
of HALL & EVANS, L.L.C.,