

DISTRICT COURT, LARIMER COUNTY, COLORADO Larimer County Justice Center 201 Laporte Avenue, Suite 100 Fort Collins, CO 80521-2761 (970) 498-6100	DATE FILED: August 26, 2020 3:48 PM FILING ID: FBA4699120956 CASE NUMBER: 2020CV30363
<hr/> Plaintiffs: STUWARD CROSS AND KATRINA RICHMAN v. Defendant: THE CITY OF FORT COLLINS, State of Colorado	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 30363 Courtroom: 5A
<p style="text-align: center;">ENTRY OF APPEARANCE AND UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING</p>	

COMES NOW, undersigned counsel, Andrew W. Callahan of the law firm of Wick & Trautwein, LLC, and enters his appearance as counsel for Defendant.

Defendant, through counsel, respectfully submits the following unopposed motion for enlargement of time to file its responsive pleading to the Plaintiffs' Complaint. In support hereof, Defendant states as follows:

1. **RULE 121 CERTIFICATION:** Undersigned counsel for the Defendant hereby advises the Court that he has conferred with Plaintiffs' counsel about the enlargement of time requested in this motion. Counsel for Plaintiffs consents to the relief requested herein.
2. Defendant signed a waiver and acceptance of service on August 6, 2020, which would make their responsive pleading due on August 27, 2020. Defendant seeks an enlargement of time up to and including September 10, 2020 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 26th day of August, 2020.

WICK & TRAUTWEIN, LLC

By: s/Andrew W. Callahan
Andrew W. Callahan, #52421
Attorneys for Defendant

CERTIFICATE OF ELECTRONIC FILING

The undersigned hereby certifies that a true and correct copy of the foregoing ENTRY OF APPEARANCE AND UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE RESPONSIVE PLEADING was filed via the Colorado Courts E-Filing System and served this 26th day of August, 2020, on the following:

W. Clayton Harris
The Sawaya Law Firm
1600 Ogden Street
Denver, CO 80218

s/ Jody L. Minch

[The original certificate of electronic filing signed by Jody L. Minch is on file at Wick & Trautwein, LLC)