

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:16-cv-00318-RM-CBS

DANIELE LEDONNE,

Plaintiff,

v.

DR. BEVERLEE MCCLURE, in her official capacity as
President of Adams State University and in her individual
capacity; and PAUL GROHOWSKI, in his official
capacity as Chief of Adams State Police Department and
in his individual capacity,

Defendants.

**PLAINTIFF DANIELE LEDONNE’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENDANTS’ PARTIAL
MOTION TO DISMISS THE COMPLAINT**

Pursuant to D.C.COLO.LCivR 6.1, Plaintiff Daniele Ledonne (“Plaintiff”), through his undersigned counsel, moves this Court to enter an order granting an extension of time of 14 days, up to and including Thursday, April 14, 2016, for Plaintiff to respond to Defendants’ Partial Motion to Dismiss the Complaint. In support of this request, Plaintiff states as follows:

D.C.COLO.LCIVR 7.1(A) CERTIFICATE OF CONFERRAL

On Thursday, March 17, 2016, counsel for Plaintiff conferred with counsel for Defendants, who do not oppose the requested extension.

1. The Plaintiff’s response is currently due on Thursday, March 31, 2016, 21 days after service of the Partial Motion to Dismiss the Complaint.

2. Due to the extensive preparation of the March 17, 2016 Preliminary Injunction hearing, and handling other pressing business matters, undersigned counsel requests an additional 14 days respond to allow counsel to consult with co-counsel and with the client before addressing the issues raised in Defendants' Motion.

3. No party will be prejudiced by this extension.

4. Accordingly, an additional 14 days to respond to Defendants' Partial Motion to Dismiss the Complaint, up to and including April 14, 2016, is in the interests of justice.

5. Pursuant to D.C.COLO.LCivR 6.1(c), counsel certifies that he is serving his client with a copy of this motion.

WHEREFORE, Plaintiff Daniele Ledonne respectfully requests that he be given 14 additional days, up to and including Thursday, April 14, 2016, to respond to Defendants' Partial Motion to Dismiss the Complaint.

Dated: March 18, 2016.

Respectfully submitted,

s/ N. Reid Neureiter

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*AS COOPERATING ATTORNEYS FOR THE
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Attorneys for Plaintiff Daniele Ledonne

CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on March 18, 2016, I electronically filed the foregoing **DEFENDANT DANIELE LEDONNE'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANTS' PARTIAL MOTION TO DISMISS THE COMPLAINT** with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following email addresses:

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s/ Karen L. Brock

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