

DISTRICT COURT, GRAND COUNTY, COLORADO 307 Moffat Avenue Hot Sulphur Springs, CO 80451	DATE FILED: June 20, 2024 8:55 AM FILING ID: 8621F13B63DC2 CASE NUMBER: 2021CV30008
<p>Plaintiff: GRANBY RANCH METROPOLITAN DISTRICT, a quasi-municipal corporation and political subdivision of the State of Colorado,</p> <p>v.</p> <p>Defendants: HEADWATERS METROPOLITAN DISTRICT, a quasi-municipal corporation and political subdivision of the State of Colorado; GRAY JAY VENTURES, LLC.; REDWOOD CAPITAL FINANCE CO., LLC, GRANBY PRENTICE, LLC; and GR TERRA, LLC.</p>	
<p><i>Attorneys for Headwaters Metropolitan District and GR Terra LLC:</i> Jamie H. Steiner, #49304 JoAnn T. Sandifer (<i>Admitted Pro Hac Vice</i>) Husch Blackwell LLP 1801 Wewatta St., Suite 1000 Denver, CO 80202 Phone: 303-749-7200 Fax: 303-749-7272 E-mail: jamie.steiner@huschblackwell.com joann.sandifer@huschblackwell.com</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p> <p>Case No. 2021CV30008</p> <p>Division 1</p>
<p>UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS</p>	

Defendants Headwaters Metropolitan District (“Headwaters”) and GR Terra LLC (“GR Terra”), by and through undersigned counsel, requests the briefing schedule for dispositive motions filed by both parties be extended by two-weeks, up to and including July 11, 2024. In support thereof, Headwaters and GR Terra state as follows:

CERTIFICATION PURSUANT TO C.R.C.P. 121 § 1-15(8)

Counsel for Headwaters and GR Terra conferred with Plaintiff’s counsel, all parties consent to the requested relief.

1. On June 4, 2024, this Court entered an Order Denying GRMD’s Motion for Entry of Final Judgment; Order Setting a Briefing Schedule for Dispositive Motions to be Filed by any Party; Notice that the Court Disregarded the Motion to Strike (the “Order”).

2. The Order re-opened the briefing schedule to allow any party to file a dispositive motion or motions. The Order provides for either party to file a dispositive motion by June 27, 2024, responses thereto by July 19, 2024 and replies by July 26, 2024.

3. Headwaters and GR request that the dispositive motions briefing schedule for all parties be extended as follows:

Event	Current Deadline	New Deadline
Dispositive Motion(s)	June 27, 2024	July 11, 2024
Response to Dispositive Motion(s)	July 19, 2024	August 1, 2024
Replies to Dispositive Motion(s)	July 26, 2024	August 8, 2024

4. Counsel for the parties have conflicting court deadlines and obligations that necessitate the request for a short amount of additional time.

5. This Court has not granted any previous extensions or continuances of the current deadline for the parties to file dispositive motions.

6. The Parties and court will be prejudiced by the granting of the requested short extension.

7. A copy of this motion is being served on undesigned counsel's client as required under C.R.C.P. 121, § 1-11.

WHEREFORE, Headwaters and GR Terra requests the briefing schedule for dispositive motions filed by the parties be extended two-weeks, starting with the opening brief deadline which would be extended to up to and including July 11, 2024, the deadline for responses thereto be extended to August 1, 2024, and the deadline to file any replies be extended to August 8, 2024.

Dated: June 20, 2024

HUSCH BLACKWELL LLP

/s/ Jamie H. Steiner

Jamie H. Steiner, #49304

JoAnn T. Sandifer (Admitted Pro Hac Vice)

Attorneys for Defendants Headwaters

Metropolitan District and GR Terra LLC

CERTIFICATE OF SERVICE

I hereby certify that June 20, 2024 a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE DISPOSITIVE MOTIONS** was served via the Colorado Courts e-filing system addressed to the following:

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