

CERTIFICATE OF C.R.C.P. 121(c) § 1-15(8) CONFERRAL

Counsel for GRMD has conferred with counsel for Defendant / Counterclaim Plaintiff Headwaters Metropolitan District (“Headwaters”) regarding this Motion and is authorized to state that Headwaters *does not oppose* an extension of time up to and including July 3, 2025, to respond to Headwaters’ motion.

BACKGROUND AND REQUEST FOR AN ENLARGEMENT OF TIME

1. The Court entered partial summary judgment in favor of Headwaters on March 3, 2025.
2. Thereafter the Court and the parties discussed outstanding issues in this matter at a March 27, 2025, status conference, including Headwaters’ claim for damages as measured by its claimed attorney’s fees and costs.
3. Headwaters filed its motion for an award of damages on May 12, 2025, asserting a claim for nearly \$1 million in damages.
4. GRMD’s deadline to respond to Headwaters’ motion is currently June 16, 2025.
5. Undersigned has been working diligently on this matter but requires additional time to complete the Response given his significant obligations in other matters. Of note, at present undersigned has significant briefs due on May 29, June 9, June 12, June 13, June 16, and June 19. These briefing deadlines had not been set at the time of the March 27, 2025, status conference.
6. Further, the significant amount claimed by Headwaters supports this request.
7. There has been no prior request for an enlargement of time regarding Headwaters’ motion.

8. No party will be prejudiced by the granting of this extension and resolution of this matter will not be materially delayed.

9. Given the above, and in order to have sufficient time to complete a Response that sufficiently and efficiently presents the issues to this Court, undersigned would benefit from and therefore requests an extension of time up to and including July 3, 2025.

WHEREFORE, GRMD respectfully requests an extension of time, up to and including, July 3, 2025, in which to file the Response to Headwaters' May 12, 2025, Motion for Award of Damages.

Respectfully submitted May 23, 2025.

**BURG SIMPSON
ELDREDGE HERSH & JARDINE, P.C.**

Duly signed original is on file in this office and available for inspection and/or copying upon request.

/s/ D. Dean Batchelder

David K. TeSelle, Reg. No. 29648

D. Dean Batchelder, Reg. No. 38425

Patrick M. Sweet, Reg. No. 51130

CERTIFICATE OF SERVICE

I certify that on May 23, 2025, a true and correct copy of this **GRANBY RANCH METROPOLITAN DISTRICT'S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE ITS RESPONSE TO HEADWATERS' MOTION FOR AWARD OF DAMAGES** was filed and served upon all counsel of record via CCE.

Duly signed original is on file in this office and available for inspection and/or copying upon request.

/s/ Natalie N. Newlander _____

Natalie N. Newlander

