

DISTRICT COURT, GRAND COUNTY, COLORADO 307 Moffat Avenue Hot Sulphur Springs, CO 80451	DATE FILED July 7, 2025 3:11 PM FILING ID: 75EE489EC78B2 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>HEADWATERS’ UNOPPOSED MOTION FOR ENLARGEMENT OF TIME TO FILE ITS REPLY IN SUPPORT OF ITS MOTION FOR AWARD OF DAMAGES</p>	

Defendant, Headwaters’ Metropolitan District (“Headwaters”), by and through its attorneys, Husch Blackwell LLC, respectfully submits this Unopposed Motion for Enlargement of Time to File its Reply in Support of its Motion for Award of Damages, and states as follows:

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

Counsel for Headwaters has conferred with counsel for Plaintiff/Counterclaim Defendant Granby Ranch Metropolitan District (“GRMD”) regarding this Motion and is authorized to state that GRMD *does not oppose* an extension of time up to and including July 17, 2025, to file its Reply Motion in Support of its Motion for Award of Damages.

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. On May 12, 2025, Headwaters filed its motion for an award of damages and supporting materials.
4. GRMD thereafter filed its unopposed motion for enlargement of time to file its response to Headwaters’ motion for an award of damages, extending that timeframe until July 3, 2025. GRMD filed its response and supporting exhibits on July 3, 2025.
5. Headwaters’ reply in support of its motion for damages is currently due on July 10, 2025. Given the fourth of July holiday and competing deadlines, Headwaters is requesting an additional week, until July 17, 2025, to file its reply in support of its motion for award of damages.
6. No party will be prejudiced by the granting of this extension and the resolution of this matter will not be materially delayed.

WHEREFORE, Headwaters respectfully requests that the timeframe for filing of its

Reply in Support of its Motion for Damages be extended one week, up to and including July 17, 2025.

Dated: July 7, 2025

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 July 7, 2025 a true and correct copy of the foregoing **UNOPPOSED MOTION FOR ENLARGEMNT OF TIME TO FILE ITS REPLY IN SUPPORT OF ITS MOTION FOR AWARD OF DAMAGES** was served via the Colorado Courts e-filing system addressed to the following:

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