

DISTRICT COURT, GRAND COUNTY, COLORADO Court Address: Grand County Combined Courts 307 Moffat Ave Hot Sulphur Springs, CO 80451 Telephone No.: (970) 725-3357	DATE FILED: October 31, 2022 2:11 PM FILING ID: 4C9669E2E5D86 CASE NUMBER: 2021CV30008
Plaintiff: GRANBY RANCH METROPOLITAN DISTRICT, a quasi-municipal corporation and political subdivision of the State of Colorado, v. Defendants: HEADWATERS METROPOLITAN DISTRICT, a quasi-municipal corporation and political subdivision of the State of Colorado; GRAY JAY VENTURES, LLC.; GRANBY PRENTICE, LLC; and GR TERRA, LLC.	<p style="text-align: center;">▲COURT USE ONLY▲</p> Case No.: 2021CV030008 Div.: Rm.:
ATTORNEYS FOR PLAINTIFFS: David K. TeSelle, Reg. No. 29648 Brian K. Matise, Reg. No. 33755 Erica N. Garcia, Reg. No. 56450 Burg Simpson Eldredge Hersh & Jardine, P.C. 40 Inverness Drive East Englewood, Colorado 80112 Telephone: (303) 792-5595 Facsimile: (303) 708-0527 E-Mail: dteselle@burgsimpson.com E-Mail: bmatise@burgsimpson.com E-Mail: egarcia@burgsimpson.com	
PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO SERVE EXPERT DISCLOSURES	

Plaintiff, Granby Ranch Metropolitan District (“GRMD”), by and through its attorneys, Burg Simpson Eldredge Hersh & Jardine, P.C., files its Motion for Extension of Time to Serve Expert Disclosures, as states as follows:

CERTIFICATE OF CONFERRAL

Undersigned counsel certifies that she has conferred with counsel for Defendants regarding the relief requested herein and understands that Defendants plan to file a Motion to Continue Trial, which will likely render this issue moot.

MOTION

1. The Court approved an Unopposed Motion to Amend Certain Case Management Order Deadlines on September 29, 2022, which set the deadline for Plaintiff's expert disclosures as November 1, 2022.

2. This case concerns complex contractual issues, and Plaintiff requires a three-week extension to serve its disclosures.

3. In turn, the requested extension would shift Defendants' deadline and the rebuttal disclosure deadlines to the following dates:

Plaintiff's Disclosure Deadline	November 22, 2022
Defendant's Disclosure Deadline	December 23, 2022
Rebuttal Disclosure Deadline	January 12, 2023

4. Good cause exists for the requested extension because the parties have diligently been working yet the complexities of the matter and Plaintiff's experts' other obligations have made the present deadline untenable.

5. No party will be prejudiced by the requested extension. This case is set for a 10-day jury trial commencing on February 6, 2023, and the requested extension will not impact that setting.

WHEREFORE, Granby Ranch Metropolitan District respectfully requests the extension of the deadline for its expert disclosures by three weeks.

Respectfully submitted this 31st day of October 2022.

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

(Original signature on file)

/s/ Erica N. Garcia

David K. TeSelle, Reg. No. 29648

Brian K. Matise, Reg. No. 33755

Erica N. Garcia, Reg. No. 56450

Attorneys for Granby Ranch Metropolitan District

CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of October 2022, a true and correct copy of the foregoing **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO SERVE EXPERT DISCLOSURES** was filed and served via Colorado Courts E-Filing on all Counsel of Record.

/s/ Erica N. Garcia

Mark Champoux, # 40480
Kyler Burgi, # 46479
DAVIS GRAHAM & STUBBS LLP
1550 17th Street, Suite 500
Denver, Colorado 80202
Telephone: 303.892.9400
mark.champoux@dgsllaw.com
kyler.burgi@dgsllaw.com

*Attorneys for Defendants Gray Jay Ventures, LLC and Granby
Prentice, LLC*

Jamie H. Steiner, #49304
JoAnn T. Sandifer (Admitted Pro Hac Vice)
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

*Attorneys for Defendant Headwaters Metro. District and GR
Terra, LLC*