

DISTRICT COURT, GRAND COUNTY, COLORADO 307 Moffat Avenue Hot Sulphur Springs, CO 80451	DATE FILED: November 17, 2022 9:35 AM FILING ID: F42848C69F821 CASE NUMBER: 2021CV30008
<p><b>Plaintiff:</b> GRANBY RANCH METROPOLITAN DISTRICT, a quasi-municipal corporation and political subdivision of the State of Colorado,</p> <p>v.</p> <p><b>Defendants:</b> 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;"><b>▲ COURT USE ONLY ▲</b></p> <p>Case No. 2021CV30008</p> <p>Division 1</p>
<p><b>DEFENDANTS’ RESPONSE TO PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO SERVE EXPERT DISCLOSURES</b></p>	

Defendants GR Terra LLC (“GR Terra”) and Headwaters Metropolitan District (“Headwaters”), by and through undersigned counsel, submit their Response to Plaintiff’s Motion for Extension of Time to Serve Expert Disclosures (the “Motion”), and in support thereof states as follows:

GRMD seeks an extension of the deadline for it to make its expert disclosures, the deadline being November 1, 2022. GR Terra and Headwaters have filed a motion to continue the jury trial scheduled to commence on February 6, 2023. Co-Defendants Gray Jay Ventures, LLC and Granby Prentice, LLC joined in the motion. The Court has scheduled a hearing on the motion to continue the trial on November 17, 2022 at 2:45 p.m.

In the event that the trial is continued, and that Defendants are provided 30 days after Plaintiff's expert disclosures are filed to file their expert disclosures, GR Terra and Headwaters do not oppose Plaintiff's Motion

Dated this 17th day of November, 2022.

HUSCH BLACKWELL LLP

*s/ Jamie H. Steiner*

Jamie H. Steiner, #49034

JoAnn T. Sandifer (*Admitted Pro Hac Vice*)

*Attorneys for Headwaters Metropolitan  
District and GR Terra LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was served via the Colorado Courts e-filing system on November 17, 2022, addressed to the following:

David K. TeSelle  
Brian K. Matisse  
Erica N. Garcia  
BURG SIMPSON ELDREDGE HERSH & JARDINE, P.C.  
40 Inverness Drive East  
Englewood, CO 80112  
dteselle@burgsimpson.com  
bmatise@burgsimpson.com  
egarcia@burgsimpson.com  
*Attorneys for Plaintiff*

Mark E. Champoux  
Kyler K. Burgi  
DAVIS GRAHAM & STUBBS LLP  
1550 Seventeenth Street, Suite 500  
Denver, CO 80202  
Telephone: (303) 892-9400  
Facsimile: (303) 893-1379  
mark.champoux@dgsllaw  
kyler.burgi@dgsllaw.com  
*Attorneys for Defendant Gray Jay Ventures, LLC and  
Granby Prentice, LLC*

*/s/ Tessa Kern*  
\_\_\_\_\_  
Practice Support Team Specialist