

DISTRICT COURT, GRAND COUNTY, COLORADO 307 Moffat Avenue Hot Sulphur Springs, CO 80451	DATE FILED: November 17, 2022 2:14 PM FILING ID: 5A34A7F31BD40 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>
UNOPPOSED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER	

Defendant Headwaters Metropolitan District (“Headwaters”) and GR Terra LLC (“GR Terra”), by and through undersigned counsel, move the Court for entry of the Stipulated Protective Order attached as Exhibit 1.

Certificate of Conferral

In accordance with Rules 26(c) and 121, § 1-15(8) of the Colorado Rules of Civil Procedure, counsel for Headwaters and GR Terra conferred with Plaintiff's counsel and counsel for Gray Jay Ventures, LLC and Granby Prentice, LLC, and none of the counsel oppose the requested relief.

Motion for Entry of Stipulated Protective Order

In support of this motion, Headwaters and GR Terra states as follows:

1. Certain information has been and will be sought by the parties to this action, which is confidential or proprietary in nature or which implicates the privacy or privilege interest of the parties or non-parties.
2. In recognition of the confidential nature of the material and the privacy rights of those involved, the parties have conferred in good faith and have agreed to the Stipulated Protective Order in order to maintain certain designated information as confidential.
3. The Parties have agreed upon the terms of the Stipulated Protective Order.
4. Information designed as "Confidential" pursuant to the Stipulated Protective Order shall be maintained in the strictest confidence, shall be disclosed only as permitted by the terms of the Stipulated Protective Order and shall be used only for the purposes permitted by the Stipulated Protective Order.
5. In order to facilitate the exchange of information for purposes of this litigation and in order to protect the confidential nature of the materials involved, Headwaters and GR

Terra respectfully requests that the Court enter the Stipulated Protective Order pursuant to C.R.C.P. 26(c).

Dated: November 17, 2022

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 on November 17, 2022 a true and correct copy of the foregoing **UNOPPOSED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER** was served via the Colorado Courts e-filing system addressed to the following:

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/s/ Tessa Kern

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