

DISTRICT COURT, GRAND COUNTY, COLORADO 307 Moffat Avenue Hot Sulphur Springs, CO 80451	DATE FILED: January 20, 2023 12:45 PM FILING ID: 607A97F3D76D4 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>
<b>UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RULE 702 MOTIONS</b>	

Defendant Headwaters Metropolitan District (“Headwaters”) and GR Terra LLC (“GR Terra”), by and through undersigned counsel moves this Court for a 14-day extension of time up to and including February 27, 2023 for the parties to file Rule 702 Motions. In support thereof, Headwaters and GR Terra state as follows:

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

Counsel for Headwaters and GR Terra conferred with Plaintiff's counsel and counsel for Gray Jay Ventures, LLC and Granby Prentice, LLC, all parties consent to the requested relief.

1. Pursuant to C.R.C.P. 16(c) the current deadline for motions challenging the admissibility of expert testimony pursuant to C.R.E. 702 is February 13, 2023.
2. On January 3, 2023, Plaintiff timely disclosed three experts. Defendants have until January 31, 2023 to disclose their experts.
3. This extension will allow time for the parties to depose each other's experts, to obtain the deposition transcripts and to adequately prepare Rule 702 Motions.
4. Additionally, the parties have a settlement conference scheduled on January 30, 2023 and the deadline to file motions for summary judgment is prior to February 13, 2023.
5. This Court has granted previous amendments to the Case Management Order that relate to expert disclosures and the filing of Rule 702 motions.
6. A ten-day Court trial is scheduled to commence on April 24, 2023.
7. This request is not for delay, nor will it prejudice any party, all parties consent to the extension.

WHEREFORE, Headwaters and GR Terra request this Court and Order granting a 14-day extension up to and including February 27, 2023 for the parties to file Rule 702 Motions.

Dated: January 20, 2023

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 January 20, 2023 a true and correct copy of the foregoing UNOPPOSED MOTION TO FOR EXTENSION OF TIME TO FILE RULE 702 MOTIONS was served via the Colorado Courts e-filing system addressed to the following:

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