

DISTRICT COURT, DENVER COUNTY, STATE OF COLORADO 1437 Bannock Street Denver, CO 80202	DATE FILED: October 23, 2019 4:09 PM FILING ID: ECE984713FEBE CASE NUMBER: 2019CV33374
<p>Harvey Sender, as Receiver for Gary Dragul, GDA Real Estate Services, LLC, and GDA Real Estate Management, LLC</p> <p><i>Plaintiff;</i></p> <p>v.</p> <p>Russell Becker, Joseph J. Pierce, and Ken Stoltzfus</p> <p><i>Defendants.</i></p>	<p style="text-align: center;">σCOURT USE ONLY σ</p> <hr/> <p>Case Number 2019CV33374</p>
<p><i>Attorneys for Defendant, Ken Stoltzfus:</i> Douglas W. Brown, Atty. Reg. No. 10429 Rachel H. Connor, Atty. Reg. No. 50831 BROWN DUNNING WALKER PC 2000 South Colorado Boulevard Tower Two, Suite 700 Denver, CO 80222 Telephone: (303) 329-3363 Fax: (303) 393-8438 E-Mail: dbrown@bdwfirm.com; rconnor@bdwfirm.com</p>	<p>Div./Ctrm.</p>
<p>KEN STOLTZFUS' MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT</p>	

COMES NOW the Defendant, Ken Stoltzfus (“Stoltzfus”), by and through its attorneys, Brown Dunning Walker PC, and hereby submits its Unopposed Motion for Extension of Time to Respond to Complaint as follows:

Certificate of Compliance with Duty to Meet and Confer

The undersigned has conferred with Plaintiffs’ counsel regarding the relief sought herein, and certifies to the Court that Plaintiffs do not oppose the requested relief.

1. This matter was filed by Plaintiff on August 30, 2019.

2. Plaintiff informed undersigned counsel that Stoltzfus was served with the Complaint and corresponding documents in Pennsylvania on September 11, 2019, which would require Stoltzfus to file an answer or response by October 16, 2019.

3. However, Stoltzfus was under the belief that he was served on September 24, 2019, which would require Stoltzfus to file an answer or response by October 29, 2019.

4. Undersigned counsel has just recently been retained in this matter and requires time to review the Complaint and corresponding documents and to formulate and draft a responsive pleading.

5. Counsel for Plaintiffs has agreed to an extension of time up to and including November 4, 2019 for Stoltzfus to file a responsive pleading.

6. Neither Plaintiff nor any other party will be prejudiced by this request.

WHEREFORE, Ken Stoltzfus requests the Court enter an Order providing Stoltzfus an extension of time through and including November 4, 2019 within which to file a responsive pleading.

DATED this 23rd day of October, 2019.

BROWN DUNNING WALKER PC

s/ Douglas W. Brown

Douglas W. Brown, Atty. Reg. No. 10429

Rachel H. Connor, Atty. Reg. No. 50831

Attorneys for Ken Stoltzfus

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October, 2019, I have served a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT**, via Colorado Courts E-Filing to the following:

Michael T. Gilbert, #15009
Patrick D. Vellone, #15284
Jeremy T. Jonsen, #48859
Rachel A. Sternlieb, #51404
ALLEN VELLONE WOLF HELFRICH & FACTOR P.C.
1600 Stout St., Suite 1100
Denver, Colorado 80202
Phone Number: (303) 534-4499
mgilbert@allen-vellone.com
pvellone@allen-vellone.com
jjonsen@allen-vellone.com
rsternlieb@allen-vellone.com

s/ Rachel H. Connor _____