

DISTRICT COURT, ADAMS COUNTY
STATE OF COLORADO

Adams County Justice Center, 1100 Justice
Center Drive, Brighton, Colorado 80601

Plaintiffs: Rebecca Brinkman and Margaret
Burd

v.

Defendant: Karen Long, in her official capacity
as Clerk and Recorder of Adams County

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Attorneys for the Plaintiffs

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CASE NUMBER: 2013CV32572

▲ COURT USE ONLY ▲

Case Number: 2013CV032572
Division C

Stipulated Motion to Enlarge Time for Answer

Plaintiffs Rebecca Brinkman and Margaret Burd, by and through their counsel Prof. Thomas D. Russell, herewith file this Stipulated Motion to Enlarge Time for Answer.

CERTIFICATION – DUTY TO CONFER

Plaintiff's counsel has conferred with counsel for Defendant Adams County. The parties agree to the relief herein sought.

MOTION

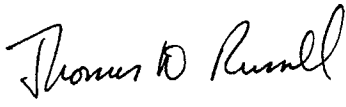
Dr. Rebecca Brinkman and Ms. Margaret Burd, by and through counsel, Prof. Thomas D. Russell, and Ms. Karen Long, by and through Adams County Attorney Heidi Miller, Esq. move the Court to extend the time for answering the complaint in this matter to Monday, December 9, 2013, as grounds therefore states as follows:

1. The answer is due tomorrow, November 20, 2013.
2. An extension until December 9, 2013 will not unduly delay resolution of this matter on its merits, no party will be inconvenienced or prejudiced, and neither party seeks the requested extension for any improper purpose.
3. Counsel for the parties have agreed that the Defendant will admit or deny each averment, unless the Defendant is without knowledge or information sufficient to form a belief as to the truth of an averment, in which instances, the Defendant will so state. C.R.C.P. 8(b). The Defendant agrees not to answer averments by pleading "Calls for a Legal Conclusion" or "the document speaks for itself." See *State Farm v. Riley*, 199 F.R.D. 276 (N.D. Illinois, 2001).

WHEREFORE, in reliance on the argument and supporting facts set forth above, the parties respectfully pray the Court grant this motion for an extension of time to answer to December 9, 2013.

Respectfully submitted this 19th day of November 2013.

Respectfully Submitted,

s/ 

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s/ 

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*Counsel for Defendant Karen Long, in her official capacity as
Clerk and Recorder of Adams County*

CERTIFICATE OF SERVICE

I certify that I e-filed the foregoing **Stipulated Motion to Enlarge Time for Answer** via *ICCES* with service via email to the following:

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DATED this 19th day of November 2013.

By: _____

Prof. Thomas D. Russell, Ph.D. #34771
Attorney for Plaintiffs

The original signed document is in counsel Thomas D. Russell's file.