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| ADAMS COUNTY DISTRICT COURT STATE OF COLORADO  Court Address:  1100 Judicial Center Drive Brighton, Colorado 80601 | DATE FILED: November 5, 2018 6:44 PM  FILING ID: 992284B67A8DF CASE NUMBER: 2018CV30347  Court Use Only |
| **Plaintiff(s):** | Case Number: 18 CV 030347 |
| **Defendant(s):** | Division/ Courtroom: W |
| *Attorneys for Plaintiff*  FIRM NAME:  ADDRESS:  Phone Number:  Fax Number: |  |
| **PLAINTIFF’S UNOPPOSED MOTION FOR 30-DAY EXTENSION OF TIME TO FILE PLAINTIFF’S RULE 26(a)(2)(B) ENDORSEMENT OF EXPERT WITNESSES** | |

**COMES NOW** the Plaintiff, Judith Makowski, as lineal heir to Edward R. Makowski (deceased) as well as Personal Representative of the Estate of Edward Makowski, by and through her counsel, Anderson Hemmat, LLC and for her Unopposed Motion For 30-day Extension of Time To File Plaintiff’s Rule 26(a)(2)(B) Endorsement of Experts, states as follows:

# RULE 121 CERTIFICATION

By his signature, the undersigned counsel certifies that he has conferred with opposing counsel regarding the relief requested in this Motion. Counsel for Defendants, Amy Twohey, Esq. has indicated that she does not oppose the relief sought here. Plaintiff has agreed to provide Defendants with a reciprocal 30-day extension for the filing of their expert witnesses.

1. Plaintiff’s Rule 26(a)(2)(B) Endorsement of Expert Witnesses is due today November 5, 2018.
2. Plaintiff has retained a liability expert and is need of an additional thirty-day time period to allow the expert to provide a final opinion/ report. Additionally, the parties are awaiting the Court’s Ruling on Defendants’ Motion For Summary Judgment.
3. C.R.C.P. 6(b) allows this Court to grant an extension of time for the doing of an act for cause shown where such request is made prior to the expiration of the time for the doing of the act.
4. Plaintiff’s counsel asserts that cause is shown by the foregoing.
5. This Motion is not filed for purposes of unnecessary delay, to prejudice the Defendants, or for any other improper purpose.

**WHEREFORE**, Plaintiff, Judith Makowski as lineal heir to Edward R. Makowski (deceased), as well as Personal Representative of the Estate of Edward R. Makowski, respectfully requests that this honorable Court grant her Unopposed Motion For 30-Day Extension of Time, thereby extending the deadline for the parties Rule 26(a)(2)(B) Endorsement of Expert Witnesses as follows:

* + Plaintiff: December 5, 2018
  + Defendants: January 2, 2019
  + Rebuttal: January 23, 2019

And for such other and further relief as to the Court appears proper in the premises. Respectfully submitted this 5th day of November, 2018.

FIRM NAME

*s/ LAWYER NAME, Esq.*

Attorneys for Plaintiff

# CERTIFICATE OF SERVICE

I hereby certify on this 5th day of November, 2018, a true and correct copy of the foregoing **PLAINTIFF’S UNOPPOSED MOTION FOR 30-DAY EXTENSION OF TIME TO FILE PLAINTIFF’S RULE 26(a)(2)(B) ENDORSEMENT OF EXPERT WITNESSES**

was electronically filed with the Court and served on the following party via ICCES:

LAWYER(S) NAMES

*s/ LAWYER NAME*