

# GRANTED

Movant shall serve copies of this ORDER on any pro se parties, pursuant to CRCP 5, and file a certificate of service with the Court

within 10 days.

DISTRICT COURT, CITY AND COUNTY OF DENVER. **COLORADO** 

Court Address: Denver City & County Building

> 1437 Bannock Street Denver, Colorado 80202

R. Michael Mullins District Court Judge

DATE OF ORDER INDICATED ON ATTACHMENT

**CO** Denver County District Court 2nd JD Filing Date: Jul 13 2011 2:31PM MDT

Filing ID: 38674987

Review Clerk: Patricia Garcia

**Plaintiff:** KAREN ANDERSON

v.

Defendants: J.P. MORGAN CHASE & CO. a/k/a J.P.

MORGAN CHASE AND COMPANY, its Known and Unknown Partners, Contractors, Subcontractors, Successors, Heirs and Assigns; DIEBOLD, INCORPORATED, its Known and

Unknown Partners, Contractors,

Subcontractors, Successors, Heirs and Assigns;

**ALL MAINTENANCE COMPANIES** KNOWN and UNKNOWN, PARTNERS, CONTRACTORS, SUBCONTRACTORS, SUCCESSORS, HEIRS AND ASSIGNS; JOHN DOE and JANE DOE, WHOSE TRUE IDENTIES ARE UNKNOWN.

Attorneys for Defendant JPMorgan Chase Bank, N.A.:

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#### **▲ COURT USE ONLY ▲**

Case Number: 2011cv2381

Div: 275

## UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

Defendant JPMorgan Chase Bank, N.A., incorrectly named in Plaintiff's Amended Complaint as J.P. Morgan Chase & Co. a/k/a J.P. Morgan Chase and Company ("Chase"), by and through its attorneys Kutak Rock LLP, hereby submits the following Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Amended Complaint and, in support thereof, states as follows:

- 1. Pursuant to C.R.C.P. 121 § 1-15(8), the undersigned hereby certifies that she has conferred with Plaintiff's counsel, Geoffrey S. Gulinson, regarding this Motion. Mr. Gulinson has advised that Plaintiff does not object to the relief requested herein.
- 2. Plaintiff filed her Amended Complaint and Jury Demand (the "Amended Complaint") on June 3, 2011. On June 21, 2011, Plaintiff served a Summons and a copy of the Amended Complaint on Chase. Pursuant to C.R.C.P. 6 and 12, Chase's response to Plaintiff's Amended Complaint is due on or before July 11, 2011.
- 3. Kutak Rock LLP was recently engaged to represent Chase in this matter. In order for counsel for Chase to complete its investigation of this matter and properly prepare an answer or otherwise respond to Plaintiff's Amended Complaint pursuant to C.R.C.P. 12(b), Chase requires a brief extension of time through and including July 25, 2011 to respond to the Amended Complaint.
  - 4. No parties to this action will be prejudiced by this brief extension.
- 5. Pursuant to C.R.C.P. 121(c) § 1-11, a certificate of service is attached hereto indicating that Chase has been served with a copy of this Motion.

WHEREFORE JPMorgan Chase Bank, N.A., respectfully requests that the Court enter an Order, in the form submitted herewith, granting it an extension of time through and including July 25, 2011 to answer or otherwise respond to Plaintiff's Amended Complaint.

Respectfully submitted this 11th day of July, 2011.

KUTAK ROCK LLP

By: s/ Blair E. Kanis
Blair E. Kanis, #41654

Attorneys For Defendant JPMorgan Chase Bank, N.A.

### **CERTIFICATE OF SERVICE**

This is to certify that on this 11<sup>th</sup> day of July, 2011, the foregoing was transmitted via the Internet to the Court-authorized service provider for electronic and/or other service to:

Geoffrey S. Gulinson & Associates, P.C. 4155 East Jewell Avenue, Suite 402 Denver, CO 80222 geoff@geoffreysguilinson.com

Michele Cerullo McAvoy, Esq. JPMorgan Chase 194 Wood Avenue South, 2nd Floor Iselin, NJ 08830

s/Sandra L. Orvis

In accordance with C.R.C.P. 121, §1-26(9), a printed copy of this document with original signatures is being maintained by the filing party and will be made available for inspection by other parties or the court upon request.

#### This document constitutes a ruling of the court and should be treated as such.

Court: CO Denver County District Court 2nd JD

Judge: Ronald M Mullins

File & Serve

**Transaction ID:** 38627052

Current Date: Jul 13, 2011

Case Number: 2011CV2381

Case Name: ANDERSON, KAREN vs. JP MORGAN CHASE & CO et al

# **Court Authorizer**

#### **Comments:**

THE COURT, having reviewed Defendant JPMorgan Chase Bank, N.A.'s ("Chase") Unopposed Motion for Extension of Time to Answer or Otherwise Respond to Plaintiff's Amended Complaint, and being fully advised in the premises and good cause shown therefor, HEREBY

ORDERS that the Motion shall be and hereby is GRANTED. Chase shall have through and including July 25, 2011, to answer or otherwise respond to Plaintiff's Amended Complaint.

### /s/ Judge Ronald M Mullins