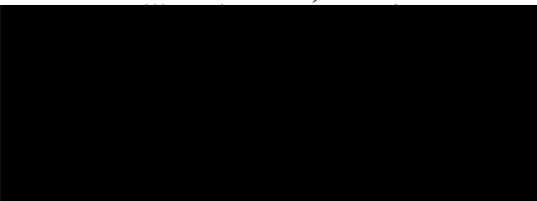


Lenden Webb, Esq. (CA SBN 236377)
Christian B. Clark, Esq. (CA SBN 330380)
WEBB LAW GROUP, APC



Attorneys for Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO**

JAMES COREY GOODE, an individual;
GOODE ENTERPRISE SOLUTIONS, INC.,
a Texas Corporation;

Plaintiffs,

v.

ROGER RICHARDS RAMSAUR, an
individual; LEON ISAAC KENNEDY, an
individual; and ADRIENNE
YOUNGBLOOD, an individual;

Defendants.

CASE NO. 1:20-cv-00947-DDD-KLM

**DECLARATION OF CHRISTIAN B.
CLARK IN SUPPORT OF JOINT
MOTION TO AMEND SCHEDULING
ORDER**

I, CHRISTIAN B. CLARK, hereby declare under penalty of perjury:

1. I am an attorney at aw licensed to practice before this Court and work under the law firm of Webb Law Group, APC, counsel for Defendants ROGER RICHARDS RAMSAUR, an individual, LEON ISAAC KENNEDY, an individual, and ADRIENNE YOUNGBLOOD, an individual, in the above-entitled matter. The facts contained within this declaration are true of my own knowledge and are such that I could, and would if called upon to do so, competently testify thereto.

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1 2. On October 8, 2020, the Honorable Judge Kristen L. Mix, United States Magistrate
2 Judge for the District of Colorado entered a Scheduling Order in the instant matter [Docket
3 #37]. The Scheduling Order set numerous deadlines for the instant case, including a deadline for
4 designation of non-parties on December 1, 2020; a deadline to file motions for leave to join
5 other parties and to amend the pleadings of December 1, 2020; a Discovery cutoff of July 30,
6 2021; a deadline to file dispositive motions of August 31, 2021; an initial expert designation
7 deadline of June 1, 2021; and a supplemental expert designation deadline of July 1, 2021.

8 3. The Scheduling Order further indicated that future status conferences would be held in
9 the matter as needed, and that a final pretrial conference would be held before the Hon. Judge
10 Domenico on a date to be determined by the Hon. Judge Domenico.

11 4. Despite the diligence of the Parties, as a result of the ongoing COVID-19 crisis, ongoing
12 law and motion work in the instant case, and the impacted schedules of the Parties, the Parties
13 are not able to adequately complete fact discovery by July 30, 2021 as currently required by the
14 Scheduling Order. The challenges the Parties have faced concerning the fact discovery deadline
15 also problematizes each of the other deadlines set forth in the Scheduling Order.

16 5. For example, on October 2, 2020, Defendants filed a Motion to Dismiss pursuant to
17 Federal Rule of Civil Procedure 12(b)(6) [Doc. #34]. Plaintiffs filed an Opposition to the
18 Motion to Dismiss on October 22, 2020 [Doc. #39], and Defendants filed a Reply to Plaintiffs’
19 Opposition on November 4, 2020 [Doc. #40]. However, an Order has not yet been entered on
20 the Motion to Dismiss, and as a result, Defendants have not yet filed their Answer per Federal
21 Rule of Civil Procedure 12(a)(4)(A). Further, Defendants’ Answer will include Counterclaims
22 against Plaintiffs which will be the subject of Discovery in the instant matter.

23 6. Additionally, between February 2021 and April, 2021 the Parties met and conferred via
24 email correspondence regarding the possibility of filing a Joint Motion for a Protective Order in
25 the instant case. My office initially approved of a draft Joint Motion for a Protective Order and
26 related Protective Order on April 30, 2021. However, upon further review of the proposed
27 Protective Order and documents produced in the matter, I notified Plaintiffs’ counsel on May
28 14, 2021 that Defendants did not believe any of the documents to be properly marked as

**DECLARATION OF CHRISTIAN B. CLARK IN SUPPORT OF JOINT MOTION TO AMEND
SCHEDULING ORDER**

1 confidential, and did not agree with the terms of the Protective Order. Defendants contend that
2 all documents produced in the instant matter should be publicly available, and that a Protective
3 Order is not warranted under Federal Rule of Civil Procedure 26(c) nor Colorado Rule of Civil
4 Procedure 26(c).

5 7. I met and conferred with opposing counsel regarding the proposal to file the instant
6 Motion. The Parties are in agreement that the requested relief is necessary in the instant matter.
7 I declare under penalty of perjury under the laws of California that the foregoing is true
8 and correct, and that this declaration was executed on this 25 day of May 2021 in San Diego
9 County, City of San Diego, California.

10
11 /s/ Christian B. Clark
12 CHRISTIAN B. CLARK
13 WEBB LAW GROUP, APC
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CERTIFICATE OF SERVICE

I, Christian B. Clark, am a citizen of the United States and am at least eighteen years of age. My business address is [REDACTED]

I am not a party to the above-entitled action. I have caused service of:

- I. JOINT MOTION TO AMEND SCHEDULING ORDER**
- II. JOINT MOTION TO AMEND SCHEDULING ORDER – DECLARATION OF CHRISTIAN B. CLARK**

along with all associated documents on all the counsel of record and interested parties by electronic email service and electronically filing the foregoing with the Clerk of the U.S. District Court using its ECF System.

I declare under penalty of perjury under the laws of the State of Colorado that the foregoing is true and correct.

DATED: May 25, 2021

/s/ Christian B. Clark
Christian Clark
WEBB LAW GROUP, APC



Attorney for Defendants Roger Richards Ramsaur, Leon Issac Kennedy, and Adrienne Youngblood