

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF COLORADO

14 JAMES COREY GOODE, an individual;
GOODE ENTERPRISE SOLUTIONS, INC.,
15 a Colorado Corporation;

16 Plaintiffs,

17 v.

18 ROGER RICHARDS RAMSAUR, an
19 individual; LEON ISAAC KENNEDY, an
20 individual; and ADRIENNE
21 YOUNGBLOOD, an individual;

22 Defendants.

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

**JOINT MOTION TO AMEND
SCHEDULING ORDER**

23 Plaintiffs JAMES COREY GOODE, an individual, GOOD ENTERPRISE
24 SOLUTIONS, INC., a Colorado Corporation, and Defendants ROGER RICHARDS
25 RAMSAUR, an individual, LEON ISAAC KENNEDY, an individual, and ADRIENNE
26 YOUNGBLOOD, an individual (collectively, “the Parties”) hereby submit this Joint Motion to
27 amend the Scheduling Order entered into by this honorable Court on October 8, 2020.
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Fresno, California 93711

1 **I. PROCEDURAL HISTORY**

2 On October 8, 2020, the Honorable Judge Kristen L. Mix, United States Magistrate
3 Judge for the District of Colorado entered a Scheduling Order in the instant matter [Docket
4 #37]. The Scheduling Order set numerous deadlines for the instant case, including a deadline
5 for designation of non-parties on December 1, 2020; a deadline to file motions for leave to join
6 other parties and to amend the pleadings of December 1, 2020; a Discovery cutoff of July 30,
7 2021; a deadline to file dispositive motions of August 31, 2021; an initial expert designation
8 deadline of June 1, 2021; and a supplemental expert designation deadline of July 1, 2021. The
9 Scheduling Order further indicated that future status conferences would be held in the matter as
10 needed, and that a final pretrial conference would be held before the Hon. Judge Domenico on
11 a date to be determined by the Hon. Judge Domenico.

12 **II. REQUESTED RELIEF**

13 The Parties have met and conferred in good faith and respectfully request that this Court
14 extend each of the aforementioned deadlines by 120 days. Despite the diligence of the Parties,
15 as a result of the ongoing COVID-19 crisis, ongoing law and motion work in the instant case,
16 and the impacted schedules of the Parties, the Parties are not able to adequately complete fact
17 discovery by July 30, 2021 as currently required by the Scheduling Order. The challenges the
18 Parties have faced concerning the fact discovery deadline also problematizes each of the other
19 deadlines set forth in the Scheduling Order.

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

1 As such, for good cause the parties propose an amendment to the Scheduling Order
2 continuing the above-listed deadlines by 120 days.

3 **CONCLUSION**

4 Therefore for good cause showing, the Parties jointly move the Court to amend the
5 Honorable Judge Kristen L. Mix’s Scheduling Order as described above and as follows:

- 6 a. to continue all deadlines in the matter by 120 days.
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11 Dated: May 25, 2021

WEBB LAW GROUP, APC

12
13 By /s/ Christian B. Clark
14 Lenden F. Webb
15 Christian B. Clark
Attorneys for Defendants

16 Dated: May 25, 2021

YANAROS LAW, P.C.

17
18 By /s/ Valerie Yanaros
19 Valerie Yanaros
20 Attorneys for Plaintiffs
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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 466 W. Fallbrook Ave, Ste. 102, Fresno, CA 93711.

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**

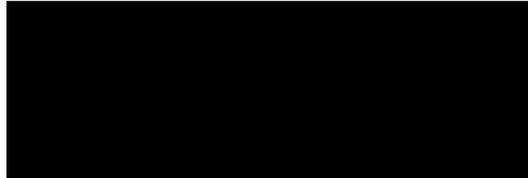
along with all associated documents on all the counsel of record and interested parties by electronic email service and electronically filing the foregoing with the Clerk of the U.S. District Court using its ECF System.

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