

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

GARY SCHWARTZ,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

Civil Action No.: 1:21-cv-02449-KLM

**JPMORGAN CHASE BANK, N.A.’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE COMPLAINT**

Defendant JPMorgan Chase Bank, N.A. (“Chase”), by and through its undersigned counsel, respectfully requests that this Court grant an extension of time of thirty (30) days, to and including October 28, 2021, within which to file a response to Plaintiff’s Complaint (the “Complaint”), Dkt. No. 10. In support thereof, Chase states as follows:

1. On August 30, 2021, Plaintiff Gary Schwartz (“Schwartz”) originally filed this action in the District Court of Denver County, Colorado. Chase was served with the Complaint on September 7, 2021.
2. On September 9, 2021, Chase removed the action filed in the District Court of Denver County to this Court. Dkt. No 1, Notice of Removal. Chase filed on September 10, 2021 a restricted copy of the Complaint, docketed as Dkt. No. 10, State Court Complaint.
3. Chase’s answer or other responsive pleading to the Complaint is currently due on September 28, 2021.

4. Chase requests a reasonable extension of thirty (30) days, to and including October 28, 2021, within which to respond to the Complaint. Good cause exists for extending this deadline. Due to the complexity of the case and the press of other business, the requested extension will provide sufficient time for Chase to investigate and assess Plaintiff's claims. This extension is short, and as such, will not prejudice Plaintiff and is consistent with the judicial efficiency considerations.

5. Pursuant to D.C.COLO.LCivR 7.1A, Chase has conferred with Plaintiff's counsel regarding the requested relief in this Motion, and Plaintiff does not oppose the relief sought herein.

WHEREFORE, Defendant JPMorgan Chase Bank, N.A. respectfully requests that the Court extend the deadline within which to respond to the Complaint by thirty (30) days, to and including October 28, 2021.

Respectfully submitted this 21st day of September 2021.

GREENBERG TRAURIG, LLP

/s/ Naomi G. Beer

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ATTORNEYS FOR

JPMORGAN CHASE BANK, N.A.

CERTIFICATE OF SERVICE

I, Naomi G. Beer, an attorney, hereby certify that a true and accurate copy of the foregoing was filed with the Clerk of the Court via the CM/ECF filing system which will send notification to the following on September 21, 2021:

John A. Chanin, Reg. No. 20749
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/s/ Naomi G. Beer
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