

DISTRICT COURT, DENVER COUNTY, COLORADO DATE FILED: October 10, 2021 1:24 PM FILING ID: 4273AA4CDB015 CASE NUMBER: 2019CV33770 	
Court Address: 1437 Bannock Street Denver, CO 80202	
Plaintiff: TUNG CHAN, Securities Commissioner for the State of Colorado v. Defendant: MARK RAY; REVA STACHNIW; CUSTOM CONSULTING & PRODUCT SERVICES, LLC; RM FARM & LIVESTOCK, LLC; MR CATTLE PRODUCTION SERVICES, LLC; SUNSHINE ENTERPRISES; UNIVERSAL HERBS, LLC; DBC LIMITED, LLC,	▲ COURT USE ONLY ▲
Attorneys for Third-Party Respondent Bellco Credit Union Name: Steve Gutierrez, Reg. No. 23208 Brian Neil Hoffman, Reg No. 32999 Hannah E. Armentrout, Reg No. 53990 Address: HOLLAND & HART LLP 555 17th Street, Suite 3200 Denver, CO 80202-3921 Phone No.: 303.295.8000 Fax No: 303.295.8261 E-Mail: sgutierrez@hollandhart.com bnhoffman@hollandhart.com hearmentrout@hollandhart.com	Case No. 19CV33770 Div: 209 Ctrm:
UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO RECEIVER'S MOTION TO COMPEL BELLCO CREDIT UNION TO RESPOND TO SUBPOENA DUCES TECUM	

Third-party Bellco Credit Union (“Bellco”), by and through its counsel, respectfully submits this Unopposed Motion for Extension of Time to Respond to Receiver’s Motion to Compel Bellco Credit Union to Respond to Subpoena *Duces Tecum* (“Motion”).

Certification of Conference with Counsel: Pursuant to C.R.C.P. 121, § 1-15(8), counsel for Bellco has conferred with counsel for Receiver, who does not oppose this motion.

1. On September 20, 2021, Receiver filed its Motion to Compel Bellco Credit Union to Respond to Subpoena *Duces Tecum* (“Receiver’s Motion”).

2. Pursuant to C.R.C.P. 121, Section 1-15(1)(b), the deadline for Bellco to respond to Receiver’s Motion is Monday, October 11, 2021.

3. Undersigned counsel is working diligently to respond, but respectfully requests an extension in order to allow Bellco additional time to meaningfully review the response.

4. Bellco thus respectfully requests a seven-day extension of time, up to and including October 18, 2021, in which to respond to Receiver’s Motion.

5. This is Bellco’s first request for an extension of time to respond to Receiver’s Motion. No party will be prejudiced by this request, as this Motion is unopposed, and no case deadlines will be impacted. This Motion is brought in good faith.

6. A proposed order is being filed contemporaneously with this Motion.

7. Under C.R.C.P. 121 § 1-11, a copy of this motion is being served on Bellco.

WHEREFORE Defendant requests an extension of time up to and including October 18, 2021, in which to file its response to Receiver’s Motion.

Dated: October 10, 2021.

Respectfully submitted,
s/ Brian Neil Hoffman

Steve Gutierrez

Brian Neil Hoffman

Hannah E. Armentrout

HOLLAND & HART LLP

Attorneys for Third-Party Respondent

Bellco Credit Union

CERTIFICATE OF SERVICE

I certify that on October 10, 2021, I caused to be served a true and correct copy of the foregoing document, electronically filed and served on all parties of record via the Colorado Court E-Filing System.

s/ Brian Neil Hoffman _____

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