

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 REPLY TO ITS RULE 12(b)(1) AND 12(b)(6) PARTIAL MOTION TO
DISMISS**

Defendant JPMorgan Chase Bank, N.A. (“Chase”), by and through its undersigned counsel, respectfully requests that this Court grant an extension of time of seven (7) days, up to and including December 9, 2021, within which to file a Reply to its Rule 12(b)(1) and 12(b)(6) Partial Motion to Dismiss, Dkt. No. 24 (the “Reply”). In support thereof, Chase states as follows:

1. Chase’s Reply is currently due on December 2, 2021.
2. The Complaint raises nine causes of action, and Chase has moved to dismiss eight of those claims. Due to the complexity of the legal issues, Chase and its counsel require sufficient time to fully analyze and address the arguments Plaintiff has raised in opposition. Because the Thanksgiving Holiday is November 25-26, and because Chase and its counsel will be unavailable to work over the long holiday weekend, Chase respectfully seeks an extension of time so that it can prepare its reply.
3. As such, Chase requests a reasonable extension of seven (7) days, up to and including December 9, 2021, within which to reply in support of its Motion. Good cause exists for

extending this deadline, because neither Chase's employees nor Chase's counsel will be available during the Thanksgiving Holiday.

4. 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 reply to the Motion by seven (7) days, up to and including December 9, 2021.

Respectfully submitted this 19th day of November, 2021.

GREENBERG TRAURIG, LLP

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JPMORGAN CHASE BANK, N.A.

CERTIFICATE OF SERVICE

I 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 November 19, 2021:

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