

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

Case No. 1:21-cv-02449-RM-KLM

GARY SCHWARTZ,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,

Defendant.

**PLAINTIFF GARY SCHWARTZ'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO FILE OBJECTION TO RECOMMENDATION RE DEFENDANT'S PARTIAL
MOTION TO DISMISS**

Plaintiff Gary Schwartz ("Plaintiff" or "Receiver"), court-appointed receiver for Mark Ray, Reva Stachniw, Custom Consulting & Product Services, LLC, RM Farm & Livestock, LLC, MR Cattle Production Services, LLC, Sunshine Enterprises, Universal Herbs, LLC, and DBC Limited, LLC, through counsel, respectfully requests this Court grant a fourteen (14) day extension of time, up to and including May 17, 2022, within which to file an objection to the Recommendation of United States Magistrate Judge regarding Defendant's Partial Motion to Dismiss ("Recommendation") [Doc. No. 66]. In support thereof, the Receiver states as follows:

1. The Receiver's objection to the Recommendation ("Objection") is currently due May 3, 2022.

2. The Recommendation includes a complex analysis of constitutional standing law that incorporates case law from multiple different jurisdictions. Due to the complexity of the issue, the Receiver and his counsel require sufficient time to fully analyze and address the holdings in the Recommendation.

3. Further, due to existing obligations and travel for the Receiver and its counsel, the Receiver's counsel are not available to work on the Objection in the coming week and the Receiver respectfully seeks an extension of time so he may prepare his Objection.

4. As such, the Receiver seeks a reasonable fourteen (14) day extension of time, up to and including May 17, 2022, within which to file his Objection. Good cause exists for extending this deadline, as the issues in the Recommendation are complex and warrant substantial attention, and due to Chase's counsel's existing obligations in the coming week.

5. Pursuant to D.C.COLO.LCivR 7.1A, the Receiver has conferred with counsel for Chase regarding the requested relief in this motion and Chase does not oppose the relief requested herein.

WHEREFORE, Plaintiff Gary Schwartz as Receiver respectfully requests that the Court extend the deadline within which to file an Objection to the Recommendation by fourteen (14) days, up to and including May 17, 2022.

Respectfully submitted this 28th day of April, 2022.

/s/ Katherine A. Roush
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April, 2021, a true and correct copy of the foregoing was served via ECF upon all parties/counsel of record.

/s/ Katherine A. Roush _____