

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Case No. 04-RB-2455 (BNB)

CHARLES H. CLEMENTS

Plaintiff,

v.

1. JANIS E. CHAPMAN
 2. THOMAS C. 'DOC' MILLER, and
 3. KATHERINE GRIER,
- Defendants

MOTION FOR EXTENTION OF TIME TO REPLY

Comes now the Proper Person Plaintiff, Charles H. Clements pro se by doctrine of necessity and MOVES the Honorable Court to GRANT an extension of time to Plaintiff to REPY to DEFENDANT KATHERINE GRIER'S MOTION FOR RULE 11 SANCTIONS , and in support of that Motion states as follows:

STATEMENT OF CONFERENCE

Plaintiff has communicated with Counsel for Defendant Katherine Grier by electronic means on 16MAR05 and Meghan E. Pound, Esq. has indicated that there is no Objection to the grant of an extension.

1. Plaintiff is under the Courts Order to Reply to DEFENDANT KATHERINE GRIER'S MOTION FOR RULE 11 SANCTIONS (hereinafter the 'Motion) by 21MAR05.

2. Defendant Grier through Counsel filed the Motion on or about 28FEB05 and Plaintiff did not receive any copy until yesterday, 16MAR05, by electronic transmission, and a hard copy by post of 17MAR05. (Plaintiff's Exhibit 1; 'Remail Cover Sheet')

3. Defendant Grier's failure to notify Plaintiff by Service of the Motion has tolled the time given for a preparation of response.

WHEREFORE Plaintiff PRAYS the Honorable Court to grant the usual period of time for Response as commencing on 17 March, 2005.

Respectfully Submitted this 18th Day of March, 2005

Charles H. Clements
1741 Dallas Street
Aurora, Colorado
80010-2018
chasclements@comcast.net

CERTIFICATE OF SERVICE
Civil Action No. 04-RB-2455 (BNB)

I, Charles H. Clements, undersigned hereby certify that a true and correct copy of the foregoing **PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO REPLY** dated 18th March, 2005, was served by depositing the same in the United States mail, first class postage prepaid this 18th day of March, 2005, to the following:

CLERK OF THE FEDERAL DISTRICT COURT
ALFRED A. ARRAJ UNITED STATES COURTHOUSE
901 19TH STREET
DENVER, COLORADO 80294-3589

PATRICK L. SAYAS
ASSISTANT ATTORNEY GENERAL
1525 SHERMAN STREET, 5TH FLOOR
DENVER, CO 80203

KEVIN C. MASSARO, ESQ
COLORADO REGISTER NO. 24682
3780 SOUTH BROADWAY, SUITE 111
ENGLEWOOD, CO 80113

TRACI VAN PELT, ESQ **
MEGHAN E. POUND **
MCCONNELL, SIDERIUS, FLEISCHNER,
HOUGHTALING & CRAIGMILE, LLC.
DENVER CORPORATE CENTER, TOWER I
4700 S. SYRACUSE ST., STE 200
DENVER, CO 80237

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McConnell Siderius Fleischner Houghtaling & Craigmile, LLC

Traci L. Van Pelt
Direct Dial: 303.458.9555
E-Mail: tvanpelt@msfhc.com

~~March 9, 2005~~

*Resent 03-15-05
By mail and email
pat*

Mr. Charles Clements
1741 Dallas Street
Aurora, CO 80010-2018

Re: Clements v. Chapman, et al.
Our File: 5545.0006

Dear Mr. Clements:

Pursuant to your request to Ms. Meghan Pound of our offices, please find enclosed a copy of Defendant Katherine Grier's Motion for Rule 11 Sanctions which was mailed to you on February 25, 2005 and filed with the Court.

Sincerely,

Patricia S. Bedingfield
Legal Assistant to Traci L. Van Pelt
and Meghan E. Pound

/pat
Enclosure

cc: Katherine Grier, Esq. (via email)
Lisa Hudson, Esq. (via email)