

DISTRICT COURT, LARIMER COUNTY, COLORADO 201 La Porte Avenue, Suite 100 Fort Collins, Colorado 80521	SERVED ONLY: March 11, 2014 3:41 PM FILING ID: CAECF1EB2C9B6 CASE NUMBER: 2013CV31385
Plaintiff: COLORADO OIL & GAS ASSOCIATION v. Defendant: CITY OF FORT COLLINS, COLORADO	▲ COURT USE ONLY ▲
Attorneys for Plaintiff Colorado Oil & Gas Association: Name(s): Mark J. Mathews, #23749 John V. McDermott, #11854 Wayne F. Forman, #14082 Michal D. Hoke, #41034 Address: BROWNSTEIN HYATT FARBER SCHRECK, LLP 410 Seventeenth Street, Suite 2200 Denver, Colorado 80202-4437 Phone: 303.223.1100 FAX : 303.223.1111 E-mail: mmathews@bhfs.com; jmcdermott@bhfs.com wforman@bhfs.com; mhoke@bhfs.com	Case Number: 2013CV31385 Div.: 5B
COLORADO OIL & GAS ASSOCIATION'S INITIAL DISCLOSURES	

Plaintiff Colorado Oil & Gas Association (“COGA”), by and through counsel, Brownstein Hyatt Farber Schreck, LLP, respectfully submits the following Initial Disclosures pursuant to Colo. R. Civ. P. 26(a)(1). COGA reserves the right to supplement these disclosures pursuant to Colo. R. Civ. P. 26(e) as additional evidence and information becomes available to it or is made known to it.

A. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION

Under Colo. R. Civ. P. 26(a)(1)(A), the following list sets forth the name and, if known, the address and telephone number of those individuals that COGA presently has reason to believe are likely to have discoverable information relevant to disputed facts alleged with particularity in the pleadings.

1. Tisha Schuller, in her capacity as President and Chief Executive Officer of COGA. Ms. Schuller may be contacted through undersigned counsel for COGA at the offices of

Brownstein Hyatt Farber Schreck, LLP, 410 17th St., Suite 2200, Denver, CO 80202; 303.223.1100. Ms. Schuller is likely to have discoverable information relating to COGA and its members.

B. DOCUMENTS

Under Colo. R. Civ. P. 26 (a)(1)(B), COGA does not have any documents within its custody or control that are relevant to disputed facts alleged with particularity in the pleadings.

C. COMPUTATION OF DAMAGES

COGA is not seeking to recover any damages at this time, but reserves the right to recover its litigation costs and attorneys' fees to the extent permitted by Colorado law.

D. INSURANCE AGREEMENTS

COGA is not aware of any applicable insurance agreement(s).

Dated this 11th day of March, 2014

BROWNSTEIN HYATT FARBER SCHRECK, LLP

/s/ Mark J. Mathews

Mark J. Mathews, #23749

John V. McDermott, #11854

Wayne F. Forman, #14082

Michael D. Hoke, #41034

Attorneys for Plaintiff Colorado Oil & Gas Association

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of March 2014, I electronically served a true and correct copy of the foregoing **COLORADO OIL & GAS ASSOCIATION'S INITIAL DISCLOSURES** via the ICCES electronic filing system which will send notification of such filing to the following:

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