

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:15-cv-00281-WJM-KMT

ABBY LANDOW,  
JEFFREY ALAN,  
SUSAN WYMER,  
LAWRENCE BEAL,

individually and on behalf of  
others similarly situated,

GREENPEACE, INC.,  
NANCY YORK,

Plaintiffs,

v.

CITY OF FORT COLLINS,

Defendant.

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**UNOPPOSED MOTION TO RESET PRELIMINARY INJUNCTION HEARING DATE**

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Plaintiffs, through their undersigned attorneys, hereby submit this Motion to  
Reset Preliminary Injunction Hearing Date, as follows:

1. Pursuant to D.C.Colo.L.Civ.R. 7.1(a), counsel for Plaintiffs certifies that a staff member from Wheeler Trigg O'Donnell LLP conferred with Ms. Hugdahl, counsel for Defendant, concerning the relief requested herein. Ms. Hugdahl requested that counsel advise the Court that "Counsel for Defendant have no objection to moving the preliminary injunction hearing. Counsel for Defendant have been advised that the following dates might be available: March 25, 2015; March 26, 2015; and March 27, 2015. Counsel have not been able to reach their clients to clear the foregoing dates, but

Counsel are undertaking efforts to make room available on their calendars to open up these dates.”

2. On March 9, 2015, the Court ordered the Preliminary Injunction hearing in this matter to be reset for Friday, March 13, 2015, at 1:00 p.m. [Dkt. 33.]

3. Due to previously scheduled commitments in other matters, counsel for Plaintiffs is unavailable to attend the hearing on March 13, 2015.

4. Plaintiffs are cognizant of the fact that they requested this hearing, and that time is of the essence. To that end, a staff member from Wheeler Trigg O'Donnell has spoken with Judge Martinez's clerk concerning other potential dates available for this hearing. Plaintiffs understand that Judge Martinez is slated to begin an eight-day trial commencing on March 16, 2015. Therefore, Plaintiffs are requesting the soonest date available for the Court, which they understand is March 25-27, 2015.

WHEREFORE, Plaintiffs request that the Preliminary Injunction hearing, currently scheduled for Friday, March 13, 2015 be rescheduled for the soonest date available on the Court's calendar, which undersigned believes is March 25-27, 2015.

Dated: March 10, 2015

Respectfully submitted,

*/s/ Thomas A. Olsen*

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*In cooperation with the ACLU Foundation of  
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*Attorneys for Plaintiffs Abby Landow, Jeffrey  
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Greenpeace, Inc., and Nancy York*

**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on March 10, 2015, I electronically filed the foregoing **UNOPPOSED MOTION TO RESET PRELIMINARY INJUNCTION HEARING DATE** with the Clerk of Court using the CM/ECF system, which will send notification of the same via email to the following:

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