IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO
DENVER DIVISION

CRUSOE ENERGY SYSTEMS LLC,	§	
	§	
Plaintiff,	§	
	§	Civil Action No. 1:22-CV-2142
v.	§	Jury Trial Demanded
	§	
ALKANE MIDSTREAM LLC,	§	
	§	
Defendant.	§	

NOTICE OF PARTIES' PROPOSALS CONCERNING A BRIEFING AND HEARING SCHEDULE FOR CRUSOE'S MOTION FOR A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Pursuant to the Court's August 29, 2022 Minute Order, the parties met and conferred to discuss, among other things, whether the parties could reach agreement on a schedule for (a) Alkane's response to the Complaint (Dkt. 1), (b) further briefing and a hearing on Crusoe's Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. 9), and (c) the written discovery and depositions requested in Crusoe's Motion to Expedite Discovery (Dkt. 11). The parties were unable to reach agreement on certain deadlines and thus respectfully submit the following competing proposals.

Event	Agreed Deadline	Alkane's Proposal	Crusoe's Proposal
Alkane's Response to Crusoe's Motion for Temporary Restraining Order	September 7		
Alkane's Response to the Complaint		October 5	September 15[1]
Completion of Fact Discovery Relating to Crusoe's Motion for Preliminary Injunction		November 4	September 30 (Written Discovery) October 7 (Depositions)
Crusoe's Supplemental Brief in Support of Motion for Preliminary Injunction		November 18	October 21
Alkane's Opposition to Motion for Preliminary Injunction		December 16	November 4
Crusoe's Reply in Support of Motion for Preliminary Injunction			November 11
Preliminary Injunction Hearing		January (pending court availability)	November-early December (pending court availability)

[1] Crusoe would be amenable to the October 5, 2022 deadline proposed by Alkane for responding to the Complaint provided that extension does not delay fact discovery.

Dated: August 31, 2022

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2022 all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system. Any other counsel of record will be served in accordance with the Federal Rules of Civil Procedure.

/s/ Ryan M. Sugden
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