IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.: 1:22-cv-02142-NYW

CRUSOE ENERGY SYSTEMS LLC, a Delaware limited liability company,

Plaintiff,

v.

ALKANE MIDSTREAM LLC, a Delaware limited liability company,

Defendant.

JOINT MOTION TO EXTEND DEADLINE TO SUBMIT MOTION FOR PROTECTIVE ORDER

Plaintiff Crusoe Energy Systems LLC ("Plaintiff") and Defendant Alkane Midstream LLC ("Defendant"), by and through their undersigned counsel, jointly move the Court for an order extending the deadline for the parties to submit a motion for a protective order by seven days. In support of the motion, the parties state:

1. On August 31, 2022, the Court ordered that "Any Motion for Protective Order, stipulated or otherwise, is due no later than September 2, 2022 at 9:00 a.m." ECF 23.

2. On September 1, 2022, the parties submitted a Joint Stipulation for Entry of an Interim Protective Order in which the parties stated they would "work in good faith to negotiate and submit a stipulated protective order within 14 days from entry of this Interim Protective Order."

3. On September 2, 2022, the Court entered the Interim Protective Order.

4. The parties are working in good faith on a final protective order. However, the parties require additional time to complete their discussions. As such, the parties request a seven-day extension of their deadline to submit a motion for protective order, making the new deadline September 23, 2022.

5. This is the parties' first request to extend the deadline to submit a motion for protective order that was established in the parties' motion for interim protective order. No prejudice will result from this brief extension because an interim protective order remains in place.

6. Pursuant to D.C.COLO.LCivR 6.1(c), a copy of this motion will be served contemporaneously on the undersigned counsels' clients.

Dated: September 16, 2022

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