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

CRUSOE ENERGY SYSTEMS LLC,	§	
	§	
***Plaintiff*,**	§	
	§	
v.	§	**Civil Action No. 1:22-cv-2142-NYW**
	§	
ALKANE MIDSTREAM LLC,	§	**Jury Trial Demanded**
	§	
***Defendant*.**	§	
	§	**HONORABLE**
	§	**JUDGE NINA Y. WANG**
	§	
	§	

PLAINTIFF CRUSOE ENERGY SYSTEMS LLC'S
UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO ALKANE'S MOTION TO DISMISS

Plaintiff Crusoe Energy Systems LLC ("Crusoe") respectfully files this unopposed Motion for a 7-day extension of the deadline for Crusoe to respond to Alkane Midstream LLC's Motion to Dismiss (ECF 57). Counsel for Crusoe conferred with counsel for Alkane, who indicated that Alkane does not oppose the requested 7-day extension.

Crusoe's response to Alkane's Motion is currently due on October 28, 2022, and no prior extensions have been granted. With the requested 7-day extension, Crusoe's response would be due on November 4, 2022. A scheduling order has not yet been entered in this case; thus, extension of this deadline will not affect any other dates currently set in the case.

Good cause exists for the requested extension. Alkane's Motion was filed on October 7, 2022. *See* ECF 57. During the ten (10) days thereafter, the attorney with primary responsibility for briefing on behalf of Crusoe, Stephanie DeBrow, was unavailable due to pre-planned international travel for her honeymoon. In light of Ms. DeBrow's unavailability for nearly 50%

of the 21-day briefing period allowed under the Local Rules, the requested extension of time is needed to prepare the best possible brief to aid this Court's determination of the issues presented in Alkane's Motion.

For the foregoing reasons, Crusoe respectfully request that the Court enter an order extending Crusoe's time to file its response to Alkane's Motion to November 4, 2022.

Dated: October 21, 2022

Respectfully submitted,

/s/ Stephanie N. DeBrow
Stephanie N. DeBrow

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Attorneys for Plaintiff Crusoe Energy Systems LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on October 21 , 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/ *Stephanie N. DeBrow*
Stephanie N. DeBrow

CERTIFICATE OF CONFERENCE - D.C.COLO.LCivR 7.1

On October 20, 2021, Crusoe's counsel conferred with Alkane's counsel, who indicated that Alkane does not oppose the requested 7-day extension.

/s/ *Stephanie N. DeBrow*
Stephanie N. DeBrow