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

UPSTREAM DATA INC.,	
Plaintiff,	Civil Action No. 1:23-cv-01252-SKC
v.	
CRUSOE ENERGY SYSTEMS LLC,	**JURY TRIAL DEMANDED**
Defendant.	

DEFENDANT'S SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT

Defendant, Crusoe Energy Systems LLC ("Crusoe"), moves for an extension of time to answer, move or otherwise respond to the Complaint [ECF No. 1] of Upstream Data Inc. ("Plaintiff" or "Upstream") from the present deadline of June 14, 2023 to July 20, 2023. This is a case for infringement of U.S. Patent, 11,574,372.

In support of this motion, Crusoe states as follows:

1. Pursuant to D.C.COLO.LCivR. 7.1(a), counsel for Defendant conferred with counsel for Plaintiff. Plaintiff agreed to the relief requested in this motion, and so Plaintiff does not oppose this motion.
2. Good cause exists for an extension of time. Defense counsel moved from the law firm of Fish & Richardson P.C. to Spencer Fane on June 26, 2023. This required consultation with her clients and her former firm as to the future representation of her clients, including Crusoe Energy Systems LLC (Defendant) on existing matters. This

move also required her to re-establish her practice at Spencer Fane, with the attendant tasks of orientation to its procedures and processes, opening matters, and working with her former firm to transfer the files to Spencer Fane. These tasks were interrupted by the July 4 holiday. The transfer of files was only completed yesterday, July 10. The additional time is sought so that counsel can complete and file Crusoe Energy's responsive papers in an orderly manner.

3. The scheduling conference is August 1, 2023. The extension will not interfere with the conference setting or the pre-conference deadlines.

4. No trial or other post-scheduling conference deadlines have been set in this matter. Granting the requested extension will not impact any other deadlines and will not prejudice any party.

5. Pursuant to D.C.COLO.LCivR. 6.1(c), counsel for Defendant certifies that a copy of this Motion has been served on his or her clients.

WHEREFORE, Defendant requests this Court enter an Order granting Defendant up to and including July 20, 2023, in which to respond to Plaintiff's Complaint.

DATED July 12, 2023:

/s/ Jacob Hollars
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Attorneys for Crusoe Energy Systems LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of July, 2023, the foregoing document was served via ICCES upon all counsel of record and by U.S. Mail to all parties that have not entered an appearance.

/s/ Kayla Dominguez
Kayla Dominguez