

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA IN AND FOR THE COUNTY OF MARICOPA

In Re the Matter of:

Plaintiff Plaintiff

V.

GREGORY GILLESPIE

Defendant

Case No.: CV2021-052893

PLAINTIFF'S MOTION TO EXTEND TIME TO FILE A RESPONSE TO THE DEFENDANT'S MOTION TO DISMISS/PARTIAL MOTION FOR JUDGMENT ON THE PLEADINGS

(Assigned to the Hon. Alison Bachus)

Plaintiff, pro se, respectfully requests an order granting Plaintiff, pro se, an additional 30 days in which to respond to the Defendant's Motion to Dismiss/Partial Motion for Judgment on the Pleadings, filed on February 15, 2022, which, given the Court's exclusion of holidays and weekends in counting time to respond, would be due March 7, 2022. Plaintiff is in the process of hiring an attorney, needs time to brief themselves on the 40+ docket entries. Plaintiff has been timely with all filings to date and this is the first request for an extension. Opposing Counsel refuses to allow an extension beyond seven days. Plaintiff is attaching a Good Faith Consultation Certificate as

pursuant to ARS 7.1(h).

WHEREFORE, Plaintiff respectfully moves the Court to grant an extension until April 14, 2022, within which to respond to the Defendant's Defendant's Motion to Dismiss/Partial Motion for Judgment on the Pleadings

A true and correct copy of the foregoing has been furnished via AZTurboCourt on February 25, 2022.

<u>/s/</u>

Pro Se Plaintiff



Pro Se Plaintiff

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

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Case No.: CV2021-052893

Plaintiff

GOOD FAITH CONSULTATION CERTIFICATE

V.

(Assigned to the Hon. Alison Bachus)

GREGORY GILLESPIE

Defendant

The following issue exists between the parties and the applicable Arizona Rules of Civil Procedure requires "good faith consultation" to resolve the issue before presenting the issue to the Court: Plaintiff needs additional time to respond to Defendant's Motions, filed February 15th, 2022. A good-faith attempt to resolve the issue was made with the Defendant's counsel to obtain this additional time for Plaintiff to hire counsel, who need time to be briefed on the case. Defendants will not allow Plaintiffs more than an additional seven days to Respond to their Motion to Dismiss/Partial Motion for Judgment on the

Pleadings. The Plaintiff has requested an extension until April 14, 2022.

UNDER PENALTY OF PERJURY

By signing below, I declare to the Court that I read, understood, and completed this document, and the information I have provided is true and correct under penalty of perjury.

A true and correct copy of the foregoing has been furnished via AZTurboCourt on February 25, 2022.

<u>/s/</u>

Pro Se Plaintiff