

DISTRICT COURT, JEFFERSON COUNTY, COLORADO 100 Jefferson County Parkway Golden, CO 80401	DATE FILED April 10, 2025 4:05 PM FILING ID: 9FE0579D1CA15 CASE NUMBER: 2023CV226
WILLIAM MONTGOMERY, Plaintiff, v. BEST BUY, L.P., Defendant.	▲ COURT USE ONLY ▲
Attorneys for Best Buy, L.P.: Lori K. Bell, Reg. No. 31714 Stephanie E. Boutsicaris, Reg. No. 51297 Montgomery Amatuzio 4100 East Mississippi Avenue, Suite 1600 Denver, CO 80246-3048 Telephone: 303-592-6600 lbell@mac-legal.com sboutsicaris@mac-legal.com	Case No.: 2023CV00226 Division: 6
BEST BUY’S MOTION FOR EXTENSION OF TIME	

Best Buy Stores L.P. (“Best Buy”), by and through its attorneys of record, Montgomery | Amatuzio, hereby submits this Motion for Extension of Time. Best Buy respectfully requests that this Court permit it to submit its attorney’s fees computation on or before April 17, 2025. As grounds, Best Buy states as follows:

CERTIFICATION PURSUANT TO C.R.C.P. § 121 1-15(8)

Undersigned counsel conferred with pro se Plaintiff concerning the substance of this Motion. Plaintiff opposes the relief requested herein.

MOTION

1. When by these rules or by a notice given thereunder or by order of court an act is required or allowed to be done at or within a specified time, the court for cause shown may, at any time in its discretion, upon motion made after the expiration of the specified period permit the act to be done where the failure to act was the result of excusable neglect. Colo. R. Civ. P. 6 (b).
2. A trial court's decision to grant an extension of time will not be disturbed upon appeal absent an abuse of discretion. *E.g., Mitchell v. Espinosa*, 125 Colo. 267, 277, 243 P.2d 412, 417 (Colo. 1952).
3. Defendant's computation of attorney's fees was due on April 8, 2025.
4. Best Buy is hereby requesting a one-week extension of time from today to submit this computation, with a new deadline of April 17, 2025.
5. Because this case has been ongoing for more than a year, Best Buy's bills consist of hundreds of pages of documents and must be re-formatted in such a way to remove privileged and sensitive information, particularly in light of the pending appeal in this matter.
6. Best Buy notes that Mr. Montgomery has six cases against Best Buy, in both Colorado trial courts and Colorado appellate courts. Despite all of these cases being factually near identical, all are in different phases of litigation or appeal, each with its own disjointed schedule and deadlines. Undersigned counsel represents Best Buy in all six cases.

7. Plaintiff's vexatious and never-ending lawsuits against Best Buy has created difficulties in keeping cases organized and separate. This regrettably resulted in calendaring errors by Best Buy regarding the deadline for this computation.
8. Based on the foregoing, Best Buy's actions constitute *excusable* neglect.
9. Best Buy respectfully requests that the Court grant Best Buy grace in responding to the chaos that Plaintiff has stirred up through his litigation practices.
10. Best Buy requests that this Court permit a brief extension to April 17, 2025. Upon information and belief, such extension will not prejudice Plaintiff.
11. Best Buy fully expects Plaintiff to appeal any adverse order of the Court, including if this Court finds in Best Buy's favor on this motion for extension of time.

WHEREFORE, for the foregoing reasons, Best Buy respectfully request that this Court permit Best Buy to submit its computation of attorney's fees on or before April 17, 2025.

Filed on April 10, 2025.

MONTGOMERY | AMATUZIO

By: s/ Stephanie E. Boutsicaris
Lori K. Bell
Stephanie E. Boutsicaris

Attorneys for Best Buy Stores, L.P.

CERTIFICATE OF SERVICE

I hereby certify that, on April 10, 2025, a true and correct copy of the foregoing **BEST BUY'S MOTION FOR EXTENSION OF TIME** was prepared for service to the following in the manner indicated below:

Pro se Plaintiff:

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s/ Samantha Trujillo

Samantha Trujillo, Legal Assistant