

**19th DISTRICT COURT,
CITY OF GREELEY,
COUNTY OF WELD,
STATE OF COLORADO**

Court Address:
901 9th Avenue,
Greeley, Colorado 80631

DATE FILED: October 30, 2023 5:32 PM
FILING ID: F4D928752434D
CASE NUMBER: 2023CV30580

**Karen Alexander and Jared Gabelman, on behalf of
themselves and all others similarly situated,**

Plaintiffs,

v.

Salud Family Health, Inc.,

Defendant.

▲ **COURT USE ONLY** ▲

ATTORNEYS FOR PLAINTIFFS:

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<p style="text-align: center;">PLAINTIFFS’ UNOPPOSED MOTION FOR LEAVE TO EXCEED THE 15 PAGE LIMIT IN THEIR MOTION FOR ATTORNEYS’ FEES, EXPENSES, AND SERVICE AWARDS</p>
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Plaintiffs, Karen Alexander and Jared Gabelman (“Representative Plaintiffs” or “Class Representatives”), respectfully move for leave to exceed the page limit in their Motion for Attorneys’ Fees, Expenses, and Services Awards and state:

CERTIFICATE OF CONFERRAL PURSUANT TO C.R.C.P. 121 § 1-15(8)

Counsel for Plaintiffs conferred with counsel for Defendant regarding this Motion to Exceed the Page Limit. Defendant does not oppose the relief requested in this motion.

1. The parties have negotiated a proposed Class Action Settlement and in connection with that settlement Counsel for Plaintiffs are prepared to file their Motion for Attorneys’ Fees, Expenses, and Service Awards.

2. Under Colo.R.Civ.P. 121, Section 1-15(1)(a), motions are generally limited to fifteen (15) pages.

3. Plaintiffs’ Motion for Attorneys’ Fees, Expenses, and Service Awards will necessarily exceed 15 pages in order to fully describe the settlement, fees, and expenses and to set forth the legal standards for approval of the fees and expenses. The longer motion will serve the purposes of judicial economy and will be in the public interest by providing full disclosure.

WHEREFORE, Plaintiffs request leave to exceed the 15-page limit and to file up to a thirty-two (32) page motion, excluding the caption and signature page. A proposed order has been filed with this motion.

Dated: October 30, 2023

Respectfully submitted,

/s/Rick D. Bailey

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Attorneys for Plaintiffs and the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2023, a true and correct copy of the accompanying document was filed via the Court's e-filing system for electronic service on all counsel of record and is available for viewing and downloading from the e-filing system.

By: /s/ Rick D. Bailey
Rick D. Bailey