

The United States District Court District of Colorado 901 19th St, Denver, CO 80294 (303) 844-3433 Plaintiff: Joshua Abrams v. Defendant(s): Division of Unemployment Insurance, 251 E 12th Ave Denver, CO 80203	FILED UNITED STATES DISTRICT COURT DENVER, COLORADO <i>9:38 am, Apr 10, 2025</i> JEFFREY P. COLWELL, CLERK ▲ COURT USE ONLY ▲
Joshua Abrams, Pro Se abramslive@gmail.com 609-968-9360 1881 E 112th Pl, Northglenn Colorado 80233	Case Number: 1:24-cv-03390-RMR Division: Courtroom
Plaintiff's Objection to Defendant's Extension	

Plaintiff Joshua Abrams submits this objection to Defendants' Motion for Extension of Time to Respond to the Amended Complaint, and further requests that the Court act promptly on Plaintiff's previously filed Emergency Motion for Injunctive Relief and related motions.

1. Plaintiff acknowledges that a prior filing mistakenly referenced a March 7, 2025 service date, based on a Clerk's Certificate of Service to the U.S. Marshals. Defendants have since confirmed that formal service was completed on **March 24, 2025**, and Plaintiff does not dispute this corrected timeline.
2. Despite the service occurring on March 24, 2025, Defendants were subject to this Court's March 7, 2025 Order requiring a **response to Plaintiff's Emergency Motion for Injunctive Relief within 14 days of service**. That deadline expired on **April 7, 2025**. As of the date of this filing, **April 10, 2025**, no response to the Emergency Motion has been submitted, in direct violation of this Court's order.

3. Defendants now request additional time, until April 28, 2025, to respond to the Amended Complaint. Plaintiff respectfully opposes this extension. The Amended Complaint has been on the docket since **February 7, 2025**, and Defendants, who are represented by multiple attorneys and counsel and supported by institutional resources have had ample time and resources to review and begin preparing a response. The justification that the complaint is lengthy or complex is unpersuasive at under 40 pages.
4. The deadline for Defendants to respond to the Amended Complaint, currently set for April 14, 2025, should remain firmly enforced, particularly in light of their prior failure to meet the Court-ordered April 7, 2025 deadline to respond to Plaintiff's Emergency Motion for Injunctive Relief.
5. No party actively engaged in ongoing constitutional violations, especially one represented by experienced legal counsel and supported by institutional resources should be afforded leniency or exceptions to standard procedural rules. Allowing such delays and pandering to their convenience only compounds the irreparable harm suffered by thousands of Colorado residents, many of whom face eviction, food insecurity, loss of access to medicine, and disruption of essential life needs due to the systemic failures at issue in this case. Defendants' delay in responding to a Court-ordered emergency motion, followed by a request for additional time, reflects misplaced priorities.

Plaintiff respectfully asks the Court to take the following actions to preserve the integrity of its prior orders and to ensure the urgent issues raised are addressed without further delay:

- **Deny Defendants' Motion for Extension of Time** to respond to the Amended Complaint, given the time already available to Defendants and the ongoing emergency nature of this case;

- **Order an immediate response** from Defendants to Plaintiff's Emergency Motion for Injunctive Relief, as required by the Court's March 7, 2025 Order — a deadline which Defendants openly missed by at least three (3) days, regardless of Plaintiff's earlier misinterpretation of the service date;
- **Rule on or schedule a hearing for Plaintiff's previously filed motions**, including the Request for Court-Appointed Counsel and earlier requested status conference all of which remain pending and urgent in light of ongoing constitutional harms;

The urgency of this case cannot be overstated. Defendants should not be afforded additional time to strategize how to dismiss or delay while constitutional rights are actively being violated and human lives are affected. Plaintiff urges the Court to prioritize immediate intervention and enforcement of its prior orders.

Respectfully submitted,

Joshua Abrams

Date: 04-10-2025 | ☐ Petitioner/Plaintiff

Joshua Abrams, Pro Se

CERTIFICATE OF SERVICE

I certify that on 04-10-2025 a true and accurate copy of the Defendant was served on the other party by:
X_E-filed, lauren.davison@coag.gov & Stephen.woolsey@coag.gov

Joshua Abrams

☐ Petitioner/Plaintiff