

AMENDED VERIFIED COMPLAINT AND MOTION TO ADD DENNIS C. PARR AS DEFENDANT OF THIS CASE

ARAPAHOE COUNTY DISTRICT COURT
7325 South Potomic Street,
Centennial, CO 80112

Plaintiff: LARRY PARR

v.

Defendant: LAW FIRM OF CHAYET AND DANZO
LLC, MARCO CHAYET, ESQ., FRANK DANZO III,
ESQ.,
LAW FIRM OF DIXON & SNOW LLC, RODNEY
SNOW, ESQ., JERRE DIXON, ESQ.
DENNIS C. PARR

Case No. 19 CV 336

Division 21

**MOTION FOR ENTRY OF PROCEDURAL ORDER TO AMEND VERIFIED COMPLAINT
AND TO ADD DENNIS C. PARR AS A DEFENDANT
AND FOR EXTENSION OF DEADLINE FOR FILING TO ALLOW REASONABLE TIME
FOR SERVICE OF SUBPOENA ON DENNIS C. PARR**

Plaintiff Larry Parr, Pro Se, submits this Motion for Entry of Procedural Order Extending Deadline for Filing of Response to Plaintiffs, and in support thereof states as follows:

1. Plaintiff Larry Parr, Pro Se, telephonically conferred with Kate Braden, Paralegal, Lasater & Martin, P.C. regarding the requested extension, and on behalf of Defendants *Chayet and Danzo, LLC*, Marco Chayet, and Frank Danzo, III, agrees to the request.
2. Plaintiff Larry Parr, Pro Se, confer with counsel for Defendants *Law Firm of Dixon & Snow*, Rodney Snow, and Jerre Dixon via electronic mail regarding the requested extension. Mr. Haughtling did not object to an extension of time, but objected to permit a response to the reply.
3. Plaintiff's response is currently due on April 21, 2020.
4. New facts and allegations regarding this case has been discovered and Plaintiff asks the Court to allow an amendment to the Verified Complaint filed January 10,

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2020. The new Amended Complaint will also include Cause of Action and Damages omitted in the previous filing.

5. In light of the above, Plaintiff Motions the Court to allow Dennis Parr, who has profound and immediate knowledge of events that took place as itemized in the Verified Complaint, to be added as a Defendant to this case.
6. According to Rule 15 of *The Colorado Rules of Civil Procedure For Courts of Record in Colorado*, II-B. "**Originals not to be treated as sacrosanct.** As with most pleadings and writings in the nature of pleadings, the purpose of justice is best served not by treating originals as sacrosanct, but rather by permitting the parties to ensure that the issues, as ultimately framed, represent the parties' true positions. *Brown v. Schumann*, 40 Colo. App. 336, 575 P.2d 443 (1978); *K-R Funds, Inc. v. Fox*, 640 P.2d 257 (Colo. App. 1981); *Zavorka v. Union Pacific R. Co.*, 690 P.2d 1285 (Colo. App. 1984).

Leave to amend shall be freely given when justice so requires. *Zertuche v. Montgomery Ward & Co., Inc.*, 706 P.2d 424 (Colo. App. 1985); *Lutz v. District Court*, 716 P.2d 129 (Colo. 1986).

Motions to amend should be freely permitted when the interests of justice would be served thereby. *In re Estate of Blacher*, 857 P.2d 566 (Colo. App. 1993).

Under this rule leave to amend should be freely granted. *Platte Valley Motor Co. v. Wagner*, 130 Colo. 365, 278 P.2d 870 (1954); *Van Schaack v. Phipps*, 38 Colo. App. 140, 558 P.2d 581 (1976); *H.W. Houston Constr. Co. v. District Court*, 632 P.2d 563 (Colo. 1981).

Provision is made in this rule that leave to amend shall be freely given when justice so requires. *Lerner v. Stone*, 126 Colo. 589, 252 P.2d 533 (1952); *Coffman v. Tate*, 151 Colo. 533, 379 P.2d 399 (1963). Section (a) reflects a liberal policy of amendment and encourages trial courts to look favorably on a request to amend. *Nelson v. Elway*, 971 P.2d 245 (Colo. App. 1998).

7. Plaintiff seeks an allowance of fourteen (14) days, to May 5, 2020, to file his Amended Complaint. This is Defendant's first request to the Court for any special circumstances. There are multiple Defendants in this case and the scope of the

MOTION FOR ENTRY OF PROCEDURAL ORDER TO AMEND VERIFIED COMPLAINT AND TO ADD DENNIS C. PARR AS A DEFENDANT AND FOR EXTENSION OF DEADLINE FOR FILING TO ALLOW REASONABLE TIME FOR SERVICE OF SUBPOENA ON DENNIS C. PARR ENDED VERIFIED COMPLAINT AND MOTION TO ADD DENNIS C. PARR AS DEFENDANT OF THIS CASE

WHEREFORE, Plaintiff Larry Parr respectfully requests the Court:

1. To grant this Motion for Amendment to the Verified Complaint, to add Dennis C. Parr as a Defendant, and
2. To allow reasonable time to submit the Amended Complaint which allows for the service of subpoena on Dennis C. Parr and
3. For such other relief the Court deems just and appropriate.

Dated: April 21, 2020.

Larry Parr, Pro Se



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Mr.LarryParr@gmail.com

CERTIFICATE OF SERVICE

I do hereby certify that on the 21st day of April 21, 2020, I served a true and correct copy of the MOTION FOR ENTRY OF PROCEDURAL ORDER EXTENDING DEADLINE FOR FILING OF RESPONSE TO PLAINTIFFS via United States mail, postage prepaid thereon, to those persons listed below:

Peter H. Doherty
Lasater and Martin, P.C.
8822 Ridgeline Blvd., Ste. 405
Highlands Ranch, CO 80129

Walther Houghtaling
Miletich, P.C.
717 17th Street, Ste 1510
Denver, CO 80202