

<p>COLORADO COURT OF APPEALS 101 West Colfax Ave. Ste. 800 Denver, CO 80202 303-861-1111</p>	
<p>Appeal from Denver County District Court The Honorable Michael A. Martinez Case No. 2010CV1867</p>	
<p>Plaintiff-Appellants: ANANDA MARGA, INC., a Colorado Nonprofit Corporation, <i>et al.</i></p> <p>v.</p> <p>Defendant-Appellees: ACHARYA VIMALANANDA AVADHUTA, <i>et al.</i></p> <p>and</p> <p>Intervenor-Appellee: ANANDA MARGA PRACARAKA SAMGHA-RANCHI</p>	<p>▲ Court Use Only ▲</p>
<p>Sean R. Gallagher, #16863 Bennett L. Cohen, #26511 POLSINELLI SHUGHART PC 1515 Wynkoop St., Ste. 600 Denver, CO 80202 (303) 572-9300 bcohen@polsinelli.com</p> <p>Attorneys for Amicus AMPS-Kolkata</p>	<p>Case No. 11CA1405</p>
<p>MOTION FOR EXTENSION TO FILE AMICUS BRIEF</p>	

Ananda Marga Pracaraka Samgha, which has more recently been known as the “Ananda Marga Pracaraka Samgha-Kolkata / United Ananda Marga Administration” and is referred to here as “AMPS-Kolkata,” pursuant to C.A.R. 27 and 29, requests a 30-day extension to file an amicus brief in support of Appellants Ananda Marga, Inc.

1. This appeal concerns a dispute over ownership and control of the assets and property of a religious organization known as Ananda Marga, Inc., headquartered in Colorado.

2. As set forth in greater detail in the attached affidavit of AMPS-Kolkata General Secretary Bhaveshananda Avadhuta, this Colorado action and appeal are just part of numerous similar and related lawsuits currently proceeding internationally. These lawsuits are essentially between two factions of the India-based Ananda Marga organization, AMPS-Kolkata and AMPS-Ranchi (which appeared as an intervenor below) over ownership and control of the organization. *See* Affidavit at ¶ 5.

3. As described in Mr. Bhaveshananda’s affidavit, any decision by this Court in the present appeal may have substantial impact in the roughly two dozen ongoing legal actions in India, as well as ongoing disputes between AMPS-Kolkata and AMPS-Ranchi in other nations. *See* Affidavit at ¶¶ 6-12.

4. Accordingly, AMPS-Kolkata, together with Appellant Ananda Marga, Inc., urge this Court to allow a modest extension for an amicus brief before wading into this international dispute between competing factions of an India-based spiritual organization.

5. Pursuant to C.A.R. 29, any amicus brief supporting the Appellant Ananda Marga, Inc., would be due at the same time as Ananda Marga's opening brief, which is today.

6. For the reasons set forth in Mr. Avadhuta's affidavit (principally difficulties in international communication, Mr. Avadhuta's involvement in a similar dispute in Australia, and difficulties in engaging counsel), AMPS-Kolkata has not had sufficient time to prepare an amicus brief. Accordingly, AMPS-Kolkata requests a 30-day extension, to May 2, 2012, in which to file a formal motion for leave to submit an amicus brief and tender its amicus brief to the Court.

7. Such an extension would not delay these appellate proceedings, or prejudice Appellees or the Intervenor AMPS-Ranchi. To this end, undersigned counsel have no objection to a comparable extension for Appellees and Intervenor AMPS-Ranchi to file their response briefs, so they can respond to the briefs from both Appellant Ananda Marga, Inc. and Amicus AMPS-Kolkata (presuming of course that the Court permits an amicus filing). Alternatively, Appellant and its

Amicus would not object to Appellees and the Intervenor filing a separate response to the proposed amicus brief 30 days after receipt, or any other briefing process and schedule the Court of Appeals deems appropriate.

8. Counsel for Appellant Ananda Marga, Inc. supports this motion for extension. Undersigned counsel has conferred with counsel for Appellees and the Intervenor AMPS-Ranchi, who oppose this motion.

WHEREFORE, Amicus AMPS-Kolkata requests that the Court allow it a 30-day extension to May 2, 2012, in which to file a formal motion for leave to submit an amicus brief and tender its amicus brief to the Court; and for such other accommodations to the briefing schedule for Appellee and Intervenor as the Court deems appropriate.

Respectfully submitted April 2, 2012.

POLSINELLI SHUGHART PC

/s/ Bennett L. Cohen
Sean R. Gallagher, no. 16863
Bennett L. Cohen, no. 26511
Attorneys for Amicus AMPS-Kolkata

CERTIFICATE OF MAILING

The undersigned does hereby certify that on April 2, 2012 a true and correct copy of the foregoing Petition for Rehearing was served via Lexis Nexis File-and Serve, or via U.S. Mail, with courtesy copies via email, to:

Timothy R. Obitts, Esq.
Mae Cheung, Esq.
Gammon & Grange, PC
8280 Greensboro Dr., 7th Floor
McLean, VA 22102
tro@gg-law.com
mac@gg-law.com

Alan C. Friedberg
Pendleton, Friedberg, Wilson & Hennessey, P.C.
1875 Lawrence Street, 10th Floor
Denver CO 80202
afriedberg@penberg.com

Charles T. Mitchell
Sander, Ingebretsen & Wake, P.C.
1660 17th Street, Suite 450
Denver, CO 80202
CMitchell@siwlegal.com

Linda Klister