

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Keith Rogers, <i>et al.</i> ,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	15-cv-11632
	)	
Sheriff of Cook County, <i>et al.</i> ,	)	Hon. Judge Edmond E. Chang
	)	
Defendants.	)	

**DEFENDANT COOK COUNTY'S UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE EXPERT REPORTS**

Defendant Cook County, by and through its attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through her assistant, Lyle K. Henretty, for his Unopposed Motion for Extension of Time to File Expert Reports, states as follows:

1. On February 15, 2022, this Court granted Plaintiffs until May 12, 2022 to serve expert reports. (Docket No. 199). In turn, it gave Defendants until June 23, 2022 to file their expert reports, and the parties until 7/27/22 to file rebuttal reports. (*Id.*). Expert depositions were to occur prior to September 19, 2022. (*Id.*)
2. By agreement of the parties, the Plaintiff served three expert reports by May 15, 2022. (Docket Nos. 200-201). In addition, prior to May 13, 2022, Plaintiff propounded more than 18,000 requests to admit on Defendants, to which Defendants objected. (Docket No. 200). In order to resolve their dispute Defendants requested until July 23, 2022 to make their expert disclosures. (*Id.*) The parties were able to resolve their outstanding discovery issues without court intervention.
3. On May 19, 2022, this Court entered a minute order extending the deadline for defense expert disclosures to July 23, 2022, with any rebuttal reports due by August 22, 2022, and depositions to finish by September 30, 2022 (Docket No. 202).

4. In that same minute order, the status date was also reset from May 20, 2022 to August 5, 2022, at 8:30 a.m., for the sole purpose of tracking the case. (Docket No. 202).

5. On behalf of all Defendants, Defendant Cook County requests additional thirteen (13) days to disclose defense experts and serve written reports. While the County's attorneys have been working diligently on the written submissions, they faced a number of intervening matters since Plaintiff's disclosures. These matters include: representing witnesses in a number of wrongful arrest/conviction matters, settlement negotiations on a different class action matter, and various motions and briefs in state and federal court. Further, the undersigned contracted COVID-19 in June and was out of work for multiple days. Finally, one of the County's expert witnesses will be in Alaska until July 19, 2022. For these reasons, Cook County seeks this brief extension of time to serve its expert reports.

6. Accordingly, Defendant Cook County respectfully requests that this Court grant an additional period for the Defendants to disclose defense experts, up to and including August 5, 2022.

7. Defendant Cook County also requests that the deadline to file any rebuttal reports to Defendants' expert disclosures similarly be extended to September 6, 2022, or 15 days after the deadline (accounting for the Labor Day holiday), and that all expert depositions are to be completed no later than September 14, 2022.

8. The undersigned attorney has conferred with counsel for Plaintiff and Co-Defendant. There is no opposition to this motion.

9. This motion is not made for the purposes of delay and is timely filed pursuant to Fed. R. Civ. P. 6(b)(1)(A). If granted, this extension will not result in any prejudice to the Plaintiff.

WHEREFORE, Defendant Cook County respectfully requests that this Honorable Court grant the extensions of time as requested above, and for any other relief this Court deems just and proper.

Date: July 14, 2022

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

By: /s/ Lyle K. Henretty  
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