

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Keith Rogers, et al.,)
)
 Plaintiff,)
) (Judge Chang)
 -vs-)
) 15-cv-11632
 Sheriff of Cook County and Cook)
 County, Illinois)
)
 Defendants)

AGREED MOTION TO RESET BRIEFING SCHEDULE AND FOR OTHER RELIEF

Plaintiffs, with the agreement of defendants, request the Court to reset the briefing schedule on cross motions for summary judgment to allow an additional two weeks for the filing of Plaintiffs' combined response/cross-motion to be due on July 21, 2025; an additional three weeks for the filing of the Defendants' combined reply/response to be due on August 25, 2025, and to reset the deadline for plaintiffs' reply to be due on September 16, 2025.

Plaintiffs also request that the Court allow the parties to file their respective combined briefs, including Plaintiffs' combined response/cross-motion and Defendants' combined reply/response, not to exceed 8,400 words (60% of the allowable length of an appellate main brief as set in Seventh Circuit Rule 32(c)). Defendants oppose adoption of a word count, and propose that the Court allow the parties to file combined responses not to

exceed 25 pages. The requested additional word count and/or page increase would not apply to Plaintiff's Reply.

Grounds for this motion are as follows:

1. The Court set a briefing schedule for cross-motions on summary judgment on April 9, 2025, ECF No. 268. Defendants filed their opening brief on June 9, 2025. Plaintiffs' response/cross-motion is due on July 7, 2025; the defense combined reply/response is due on August 4, 2025, and plaintiffs' reply to be due on August 25, 2025.

2. Plaintiffs, with the agreement of Defendants, ask the Court to allow an additional two weeks for Plaintiffs' combined response/cross-motion, an additional three weeks for Defendant's combined reply/response and an additional two weeks for Plaintiffs' reply. This request is based on intervening professional obligations of the undersigned counsel (filing of responses to summary judgment motions in *Sims v. City of Chicago*, 19-cv-2347, due June 30, 2025), the complexity of the issues raised by defendants in their motion, and personal obligations of the undersigned counsel (a pre-paid family trip from July 6, 2025 through July 9, 2025).

3. The parties also agree that the Court should allow the parties to file combined memoranda that exceed the fifteen pages authorized by Local General Rule 7.1:

- a. Plaintiffs propose that the Court allow the parties to file briefs not to exceed 60% of the allowable length of an appellate main brief set out in Seventh Circuit Rule 32(c). Adopting a word count would allow the use of 13 point type in a non-compressed font (such as Century, rather than Times-Roman or Garamond) and a six inch width for each line of text, rather than the six and a half inch width allowed by Local General Rule 7.1. A word-count limit would also minimize the excessive use of footnotes. Plaintiffs propose that the Court set a word limit of 8,400 words (60% of the allowable length of an appellate main brief as set in Seventh Circuit Rule 32(c)).
- b. Defendants propose that the Court allow the parties to file combined responses not to exceed 25 pages. Defendants argue that Plaintiffs' proposed word count limit is prejudicial to Defendants, as it seeks to alter a standard procedural term after Defendants have already filed their opening brief.

4. Plaintiffs' undersigned counsel has shared a draft of this motion with defense counsel and is authorized to submit the request for a readjustment of the briefing schedule as agreed.

Respectfully submitted,

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