

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

**PLAINTIFFS' MOTION FOR A  
THREE DAY EXTENSION OF TIME**

Plaintiffs request that the Court grant a 3-day extension of time for all dates on the present briefing schedule on cross-motions for summary judgment.

Grounds for this motion are as follows:

1. Undersigned counsel set aside the past week to complete the summary judgment documents due today. Counsel has today completed a 14 hour workday in an unsuccessful attempt to complete all filings. Counsel drafts this motion at 11:09 p.m. on July 21, 2025.

2. Counsel has completed a response to defendants' statement of facts and prepared a statement of additional facts and plaintiffs' statement of facts. Counsel has also collected the exhibits for the filings. One document remains: the memorandum on the cross-motions.

3. Notwithstanding counsel's hard efforts, it is now obvious that it is impossible to complete a memorandum on the cross-motions that confirms to reasonable standards of professional competence. Counsel therefore requests a three day extension of time on all dates in the present briefing schedule: plaintiffs' combined response/cross-motion to be due on July 24, 2025; the defense's combined reply/response to be due on August 28, 2025, and plaintiff's reply due on September 19, 2025.

4. Plaintiffs' undersigned counsel will request defense counsel to advise the Court on July 22, 2025 whether defendants oppose this request.

Respectfully submitted,

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