

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

BEN BAKER and CLARISSA GLENN,)
Plaintiffs,) Case No. 16 CV 8940
vs.) Judge Franklin U. Valderrama
CITY OF CHICAGO et al.,) Magistrate Judge Shelia M. Finnegan
Defendants.) (This case is part of *In re: Watts*
) *Coordinated Pre-trial Proceedings*, Master
) Docket Case No. 19 CV 1717)

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE SUMMARY JUDGMENT**

All Defendants, City of Chicago, Alvin Jones, Robert Gonzalez, Douglas Nichols, Jr.,
Manuel Leano, Brian Bolton, Elsworth Smith, Jr., Ronald Watts, and Kallatt Mohammed by and
through their undersigned counsel, hereby move unopposed for a short extension of time to file
their motions for summary judgment, as follows:

1. On August 30, 2023, this Court held a status hearing and set a trial date of January 8, 2025, set numerous pre-trial deadlines, and set the following briefing schedule on the parties' anticipated summary judgment motions: motions due 8/26/2024, responses due 9/16/2024, and replies due 9/30/2024. Dkt. 270.
2. Defendants have been working diligently to complete their respective summary judgment motions. However, due to the size of the record in this case, the complexity of the issues involved, and work in the coordinated pre-trial proceedings, including expert discovery in other test cases set for trial, Defendants are in need of an additional ten (10) days to file their respective motions. The additional time also will allow defense counsel to coordinate and streamline the

briefing and statements of fact so as not to burden the Court or Plaintiffs with duplicative pleadings.

3. All parties have conferred and Plaintiffs indicated that they did not object to Defendants' request, so long as the requested extension does not jeopardize the trial date. Plaintiffs have stated that if the requested extension would jeopardize the trial date, they oppose the extension.
4. Defendants do not believe their requested ten-day extension will jeopardize the trial date, or any other pre-trial deadline for that matter.
5. Therefore, Defendants respectfully request that this Honorable Court modify the existing summary judgment schedule as follows: motions due 9/5/2024, responses due 9/26/2024, and replies due 10/10/2024.
6. This motion is being made in good-faith, not for purposes of delay, and no party will suffer undue prejudice as a result of this extension.

WHEREFORE, Defendants respectfully request this Honorable Court grant the requested extension of time to file summary judgment and modify the briefing schedule accordingly.

Dated: August 19, 2024.

Respectfully submitted,

By: /s/ Paul A. Michalik
Special Assistant Corporation Counsel
One of the Attorneys for Defendant City of
Chicago

By: /s/ Jason Marx
Special Assistant Corporation Counsel
One of the Attorneys for Defendants Alvin
Jones, Robert Gonzalez, Douglas Nichols,
Jr., Manuel Leano, Brian Bolton, and
Elsworth Smith, Jr.

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Katherine C. Morrison
Elizabeth A. Ekl
Dhaviella R. Harris
Burns Noland, LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090

Andrew M. Hale
Amy A. Hijjawi
Anthony E. Zecchin
Kelly M. Olivier
William E. Bazarek
Hannah Beswick-Hale
Jason M. Marx
Hale & Monico LLC
53 W. Jackson Blvd., Suite 334
Chicago, IL 60604
(312) 341-9646

By: /s/ Eric S. Palles
Special Assistant Corporation Counsel
One of the Attorneys for Defendant Kallatt
Mohammed

Eric S. Palles
Sean M. Sullivan
Mohan Groble Scolaro, PC
55 W Monroe, Suite 1600
Chicago, IL 60603
Phone: (312) 422-9999

By: /s/ Brian P. Gainer
Special Assistant Corporation Counsel
One of the Attorneys for Defendant Ronald
Watts

Brian P. Gainer
Monica Burkoth
Lisa M. McElroy
Johnson & Bell, Ltd.
33 W. Monroe St., Suite 2700
Chicago, IL 60603
(312) 372-0770

CERTIFICATE OF SERVICE

I, Jason Marx, an attorney, hereby certify that on August 19, 2024, I caused to be filed with the Clerk of the Court's CM/ECF system a copy of DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE SUMMARY JUDGMENT which simultaneously served copies on all counsel of record via electronic notification.

/s/ Jason Marx