

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

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

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One of the Attorneys for Defendant City of
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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