

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Ben Baker and Clarissa Glenn,)	
)	Case No. 16 C 8940
Plaintiffs,)	
v.)	Hon. Franklin Valderrama
)	
City of Chicago, et al.,)	
)	
Defendants.)	

**DEFENDANT OFFICERS' MOTION FOR LEAVE TO FILE
OVERSIZED MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

Defendants Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Jr., and Elsworth J. Smith, Jr. (collectively "Defendant Officers"), by their attorneys, submit this unopposed motion for leave to file an oversized motion for summary judgment. In support thereof, Defendant Officers state:

1. Defendant Officers' motion for summary judgment is due to be filed September 5, 2024. Dkt. 383.
2. Plaintiffs filed a 41-page Second Amended Complaint, consisting of 251 paragraphs containing multiple claims, against multiple defendants, based on multiple legal theories. Dkt. 238.
3. Due to the number and complexity of the issues required to be addressed, Defendant Officers' Motion for Summary Judgment exceeds the limit provided by the the local rules, without leave of court.
4. Defendant Officers respectfully submit that its oversized motion, which contains 56 pages, are warranted due to the number and complexity of the legal issues.

5. A copy of Defendant Officers' Motion for Summary Judgment is attached hereto as Exhibit A, excluding exhibits which will be filed once leave is granted.
6. Undersigned counsel for Defendant Officers conferred with Plaintiffs' counsel regarding this motion, and Plaintiffs' counsel indicated the motion could be filed as unopposed.

WHEREFORE, Defendant Officers respectfully requests leave of court to file their oversized Motion for Summary Judgment, consisting of 56, pages, as well as any other relief that this Court deems appropriate.

Respectfully submitted,

/s/ Amy A. Hijjawi

Special Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2024, I electronically filed the foregoing **Defendant Officers' Motion for Leave to File Oversized Motion for Summary Judgment (*Unopposed*)** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to counsel of record.

/s/ Amy A. Hijjawi