

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 19-cv-1717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)
) *This Document Relates to All Cases*
)

THIS FILING RELATES TO CASE NO. 16-cv-8940

Unopposed motion for extension of time to respond to summary judgment motions

Plaintiffs respectfully request a two-week extension of time to respond to Defendants' motions for summary judgment, up to and including October 10, 2024, stating in support as follows:

1. After receiving an unopposed extension of time, Defendants filed motions for summary judgment on September 5, 2024.
2. In total, Defendants filed 109 pages of briefs and 199 separate paragraphs of facts pursuant to Local Rule 56.1 (many of which contain numerous individual sentences).
3. Plaintiffs have been working diligently to respond to Defendants' motions for summary judgment, but they are unable to do so within the current deadline, which provided three weeks to respond to the motions.
4. In addition, as discussed at the recent status conference, the parties are exploring whether they might be able to achieve a settlement short of trial.
5. To allow the parties to continue to devote resources to determining whether a settlement might be reached and because of the large volume of material to which Plaintiffs must

respond, Plaintiffs respectfully request a two-week extension of time to respond to Defendants' motions for summary judgment, making their response due on October 10, 2024.

6. Plaintiffs have conferred with Defendants, who do not oppose this request. Defendants further request that the deadline for their replies in support of their motions for summary judgment be extended to October 31, 2024.

WHEREFORE, Plaintiffs request that the Court extend the time for them to respond to summary judgment by two weeks, up to and including October 10, 2024, and that the deadline for Defendants' replies in support of their motions for summary judgment be extended to October 31, 2024.

Respectfully Submitted,

/s/ Scott Rauscher
One of Attorneys for Plaintiffs

Jon Loevy
Arthur Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Gianna Gizzi
LOEVY & LOEVY
311 North Aberdeen Street,
Chicago, IL 60607
(312) 243-5900
scott@loevy.com