

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

LIONETTA WHITE, Special Administrator )  
of the Estate of LIONEL WHITE SR., ) Case No. 17 C 2877  
Plaintiff, )  
v. ) Judge Sara L. Ellis  
City of Chicago, Ronald Watts, Phillip )  
Cline, Debra Kirby, Alvin Jones, Elsworth ) Magistrate Sheila M. Finnegan  
Smith, Jr., Kallatt Mohammed, Manuel )  
Leano, Brian Bolton, Robert Gonzalez, and ) (This case was formerly part of *In re:*  
Douglas Nichols, ) Watts Coordinated Pretrial Proceedings,  
Defendants. ) Master Docket No. 19-cv-1717)

**THE PARTIES' AGREED MOTION FOR EXTENSION  
OF TIME TO FILE SUMMARY JUDGMENT & DAUBERT MOTIONS**

Plaintiff Lionetta White, Special Administrator of the Estate of Lionel White Sr; and Defendants, City of Chicago, Alvin Jones, Elsworth Smith Jr., Manuel Leano, Brian Bolton, Robert Gonzalez, Douglas Nichols, Jr., Kallatt Mohammed, and Ronald Watts by and through their undersigned counsel, hereby move for an extension of time to file their motions for summary judgment and Daubert motions, as follows:

1. On September 4, 2024, this Court set the following briefing schedule on the parties' anticipated summary judgment motions: motions due 12/20/2024, responses due 1/27/2025, and replies due 2/17/2025. Dkt. 188. The Court also set 12/20/24 as the due date for Daubert Motions. Dkt. 188.

2 The parties seek an extension to submit respective summary judgment and/or  
Daubert motions due to the size of the record in this case, the complexity of the issues involved,  
and work in the former coordinated pre-trial proceedings, including expert discovery in multiple

cases now set for trial. motions. The additional time also will allow Defendants and Plaintiff to attempt to coordinate and streamline the briefing and statements of fact so as not to burden the Court with duplicative pleadings. In addition, this is the parties first request for an extension on summary judgment and Daubert motions.

3. All parties have conferred and agree to the revised briefing schedule.

4. The parties do not believe their requested extension will jeopardize the trial date, or any other pre-trial deadlines for that matter. If the requested extension would jeopardize the trial date, Plaintiff would not join in this motion and would object to any extension that jeopardizes the trial date.

5. Therefore, the parties respectfully request that this Honorable Court modify the existing summary judgment schedule as follows: motions due 2/14/2025, responses due 3/14/2025, and replies due 3/28/2025. In addition, Daubert Motions would be due by 2/15/25.

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**, the parties respectfully request this Honorable Court grant the requested extension of time to file summary judgment and Daubert motions and modify the briefing schedule accordingly.

Dated: December 4, 2024

Respectfully submitted,

By: /s/ Scott R. Rauscher  
Attorneys for Plaintiff

By: /s/ William E. Bazarek  
Special Assistant Corporation Counsel  
One of the Attorneys for certain Defendant  
Officers

Jonathan I. Loevy  
Arthur R. Loevy  
Joshua A. Tepfer  
Russell R. Ainsworth  
Scott R. Rauscher  
Theresa H. Kleinhaus  
Sean Starr  
Wallace B. Hilke  
Gianna Gизzi  
Loevy & Loevy  
311 N. Aberdeen, 3<sup>rd</sup> Floor  
Chicago, IL 60607  
(312) 243-5900

By: /s/ Joel Flaxman  
Attorneys for Plaintiff

Joel Flaxman  
Kenneth Flaxman  
Maya Demianczuk  
Kenneth N. Flaxman, P.C.  
200 S. Michigan Ave.  
Suite 201  
Chicago, IL 60604  
(312) 427-3200

By: /s/ Terrence M. Burns  
Special Assistant Corporation Counsel  
One of the Attorneys for Defendants City of  
Chicago

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

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  
Alezza Mian  
Johnson & Bell, Ltd.  
33 W. Monroe St., Suite 2700  
Chicago, IL 60603  
(312) 372-0770

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

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

**CERTIFICATE OF SERVICE**

I, William E. Bazarek, an attorney, hereby certify that on December 4, 2024, I electronically filed the foregoing, THE PARTIES' AGREED MOTION FOR EXTENSION OF TIME TO FILE SUMMARY JUDGMENT & DAUBERT MOTIONS, with the Court's CM/ECF system, which simultaneously sent an electronic copy of the same to all Counsel of Record.

*s/ William E. Bazarek*  

---