

**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.,)	
)	
Plaintiff,)	
)	Case No. 17 CV 2877
v.)	
)	Judge Sara L. Ellis
CITY OF CHICAGO, RONALD WATTS,)	
PHILIP CLINE, DEBRA KIRBY, ALVIN)	Magistrate Judge Laura K. McNally
JONES, ELSWORTH SMITH JR.,)	
KALLATT MOHAMED, MANUEL)	
LEANO, BRIAN BOLTON, ROBERT)	
GONZALEZ, and DOUGLAS NICHOLS,)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
DAUBERT AND DISPOSITIVE MOTIONS**

Defendants, City of Chicago, Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Elsworth Smith, Jr., Kallatt Mohammed, and Ronald Watts, by their attorneys, for their unopposed motion for an extension of time to file Daubert and dispositive motions, state:

1. On February 20, 2025, this Court set the following briefing schedule on Daubert and summary judgment motions: Daubert and summary judgment motions are due on March 21, 2025; responses are due April 21, 2025; and replies are due by May 12, 2025 (Dkt. 212).

2. Counsel for Defendants and Counsel for Plaintiff have been working cooperatively and diligently to complete the joint statements of undisputed material facts in compliance with this Court's standing order, including several meet and confers and the exchange of multiple drafts over the past few weeks. Although the process is nearly complete, the parties need a little more time to finalize the joint statements of undisputed material facts.

3. At the same time, Defendants have been working to complete their respective briefs. However, due to the number and complexity of the issues involved and other professional obligations of counsel, Defendants request a short extension of time to finalize their Daubert motions, summary judgment motions, and the joint statements of undisputed material facts supporting the summary judgment briefing.

4. Defendants have communicated with Plaintiff's counsel who advised Plaintiff does not oppose the requested extension of time. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, Defendants respectfully request that this Court grant the Defendants' unopposed motion to extend Daubert and summary judgment briefing, and set a new briefing schedule as follows:

- Daubert motions, motions for summary judgment, and the joint statements of undisputed material facts to be filed by March 31, 2025;
- Responses to Daubert and summary judgment motions to be filed by May 1, 2025;
- Plaintiff's statement of additional facts, consistent with the ruling on the motion to clarify, to be filed by May 1, 2025; and
- Replies to Daubert and summary judgment motions to be filed by May 22, 2025.

Dated: March 19, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 19, 2025, I electronically filed the foregoing **Defendants' Unopposed Motion for Extension of Time to File *Daubert* and Dispositive Motions**, with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to:

s/ Daniel Noland
