

**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,	)	No. 17 C 2877
	)	
vs.	)	Judge Sara L. Ellis
	)	
CITY OF CHICAGO, RONALD WATTS,	)	Magistrate Judge Laura K. McNally
ALVIN JONES, ELSWORTH SMITH JR.,	)	
KALLATT MOHAMMED, MANUEL LEANO,	)	
BRIAN BOLTON, ROBERT GONZALEZ,	)	
and DOUGLAS NICHOLS,	)	
	)	
Defendants.	)	

**DEFENDANT OFFICERS' UNOPPOSED MOTION FOR EXTENSION OF  
TIME TO FILE REPLY IN SUPPORT OF SUMMARY JUDGMENT**

NOW COME Defendant Officers Alvin Jones, Elsworth Smith, Jr., Manuel Leano, Brian Bolton, Robert Gonzalez, and Douglas Nichols, by and through their attorneys, and file this unopposed motion for extension of time to file their reply in support of summary judgment:

1. On 3/24/25, this Court ordered: *Daubert* motions, motions for summary judgment, and the joint statements of undisputed material facts are due by 3/31/2025; responses to *Daubert* and summary judgment motions are due by 5/1/2025; Plaintiff's statement of additional facts, consistent with the ruling on the motion to clarify, is due by 5/1/2025; and replies in support of *Daubert* motions and summary judgment motions are due by 5/22/2025. Dkt. 221.
2. The parties have met the above deadlines, but Defendant Officers are in need of a one-day extension, until 5/23/25, to file their reply in support of summary judgment.

3. On May 21, 2025, the parties conferred, and Plaintiff's counsel does not oppose the requested extension provided that the extension does affect the 9/15/25 trial date.
4. Defendant Officers do not believe a one-day extension will affect the trial date, and respectfully request this brief extension to file their reply.

**WHEREFORE**, Defendant Officers respectfully request that this Honorable Court grant the above requested relief and order that their reply to summary judgment be due 5/23/25.

Dated: May 21, 2025.

Respectfully submitted,

/s/ Jason Marx

Special Assistant Corporation Counsel  
One of the Attorneys for the Defendant Officers

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on May 21, 2025, I electronically filed the foregoing **Defendant Officers' Unopposed Motion for Extension of Time to File Reply in Support of Summary Judgment** 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/ Jason Marx