

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

JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE DEPOSITIONS

Defendants, Cook County, through its attorneys, Johnson and Bell Ltd., Sheriff of Cook County, through its attorneys, Sanchez, Daniels & Hoffman, LLP, and Plaintiffs, Montrell Carr and Quintin Scott, through their attorney, Kenneth N. Flaxman, pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, respectfully move this Honorable Court to Extend the deadline for the parties to complete the three remaining depositions to complete discovery on class-certification issues. In support thereof, the parties state as follows:

1. On July 13, 2020, this Court ordered the parties to complete all remaining depositions by September 11, 2020. [Dkt. #119]
2. The parties have been working diligently to schedule the remaining depositions in this case. However, due to scheduling conflicts, two of the remaining depositions need to be scheduled beyond the deadline set by this Court.
3. The parties have set the following firm dates for the remaining depositions:
 - a. Plaintiff Carr will be deposed on 9/10/2020.
 - b. Plaintiff Scott will be deposed on 9/14/2020.

c. Dr. Jorelle Alexander will be deposed on 9/25/2020.

4. This request is not made for the purpose of delay or for any other improper purpose.

WHEREFORE, the parties jointly request an extension through September 25, 2020 to complete these three remaining depositions.

Respectfully Submitted,

By: /s/ Monica Burkoth

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CERTIFICATE OF SERVICE

I, Monica Burkoth, hereby certify that, in accordance with Fed. R. Civ. P. 5 and LR 5.5 and the General Order on Electronic Case Filing (ECF), I served this Notice, together with the documents herein referred, electronically via the ECF-CM system on September 3, 2020.

/s/ Monica Burkoth _____

Monica Burkoth