

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

MONTRELL CARR and QUINTIN SCOTT, individually and for a class,	)
	)
	)
<i>Plaintiffs,</i>	)
	)
v.	)
	)
SHERIFF OF COOK COUNTY and COOK COUNTY, ILLINOIS	)
	)
	)
<i>Defendants.</i>	)

Case No. 17-cv-7135  
Hon. Martha M. Pacold  
Magistrate Hon. David Weisman

**DEFENDANT COOK COUNTY'S UNOPPOSED MOTION FOR LEAVE TO FILE A  
RESPONSE IN EXCESS OF FIFTEEN PAGES**

Defendant COOK COUNTY, ILLINOIS, by its attorney KIMBERLY M. FOXX, State's Attorney of Cook County, through Special Assistant State's Attorney, JOHNSON & BELL, LTD., pursuant to Local Rule 7.1, states as follows:

1. On November 2, 2020, Plaintiffs filed a motion for class certification, addressing the multiple requirements found in Rule 23, including ascertainability, numerosity, commonality, typicality, adequacy, predominance, and superiority.
2. Defendant's response to the motion for class certification is due Monday, December 7, 2020.
3. Due to the multiple Rule 23 requirements Defendant must address, Defendant respectfully requests it be allowed more than fifteen (15) pages to adequately respond to Plaintiffs' motion for class certification.
4. Defendant seeks leave to file a response not to exceed twenty-five (25) pages, excluding the table of contents, table of cases, and signature page.

5. Plaintiffs' counsel advised Defendant's counsel that he does not oppose this motion if the Court will allow Plaintiffs up to twenty-five (25) pages for their reply brief. Defendant does not oppose Plaintiffs' request to submit a twenty-five (25) page reply brief.

WHEREFORE, Defendant respectfully requests that this Court enter an order granting Defendant leave to file a response to Plaintiffs' motion for class certification not to exceed twenty-five pages and granting reciprocal relief to Plaintiffs to file a reply memorandum not to exceed twenty-five pages.

Respectfully Submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

Dated: December 1, 2020

/s/ *Samuel D. Branum*  
Special Assistant State's Attorney

Brian P. Gainer ([gainerb@jbltd.com](mailto:gainerb@jbltd.com))  
Monica Burkoth ([burkothm@jbltd.com](mailto:burkothm@jbltd.com))  
Lisa M. McElroy ([mcelroyl@jbltd.com](mailto:mcelroyl@jbltd.com))  
Samuel D. Branum ([branums@jbltd.com](mailto:branums@jbltd.com))  
Johnson & Bell, Ltd.  
33 W. Monroe, Ste. 2700  
Chicago, Illinois 60603  
(312) 372-0770

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on **December 1, 2020**, I caused to be served the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

*/s/ Samuel D. Branum*

Special Assistant State's Attorney