

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

QUINTIN SCOTT, )  
 )  
 Plaintiff, ) No. 17 CV 7135  
 )  
 v. ) Judge Martha Pacold  
 )  
 COOK COUNTY, et al, )  
 )  
 Defendants. )

**REPLY IN SUPPORT OF OPPOSED MOTION FOR EXTENSION OF TIME**

More than six years now, and an entire Seventh Circuit appeal, have passed since this Court’s September 7, 2018 deadline, Dkt. 31, for Plaintiff, Quintin Scott (“Plaintiff”) to amend his complaint. After all that time, Scott now insists that time is of such essence as to render unreasonable *any* extension of time to respond to his long-overdue motion to amend his complaint. That argument is meritless, and Defendants’ motion for an extension of time should be granted, for the reasons set forth in that motion. Dkt. 215. That said, a few brief points in reply are in order.

1. Scott incorrectly argues that Defendants have not complied with the Court’s scheduling order and speculates “that defense counsel has [not] begun to work on the response to the motion to add additional plaintiffs.” Dkt. 216 at 2. But Defendants sought an extension of time prior to the date by which their response to Plaintiff’s motion is due, so any argument by Plaintiff that Defendants have not complied with the Court’s orders is facetious. And Scott’s speculation is misplaced. Defendants have been working diligently on the response brief, but as explained in the original motion, that response is not yet complete and will necessitate additional time to complete. Moreover, once a draft of that response is complete, review by the Supervisor of Civil Appeals & Special Projects is required because Plaintiff’s motion to add additional plaintiffs involves the

pending petition for writ of certiorari filed in the United States Supreme Court. Dkt. 215 at 2. Notably, Plaintiff does not dispute that the Supervisor of Civil Appeals has an approaching deadline in a Second Amendment appeal that will interfere with his ability to review Defendants' draft response.

2. Plaintiff also argues that undersigned counsel should be delegating her scheduled deposition responsibilities to other attorneys. Dkt. 216 at 3. However, undersigned counsel is the only attorney working on these lawsuits involving the same plaintiff in the case where depositions are scheduled, *Fanady v. Israelov*, 2023 L 6667, including *Fanady v. Dart, et al.*, 23 C 5806, and she is the only person with the institutional knowledge required to represent these witnesses during these scheduled depositions next week.

3. Contrary to Plaintiff's unsupported statement that “[t]hese matters and other responsibilities outlined in [Defendants'] motion do not show good cause for yet another extension,” Plaintiff fails to cite to any case law where a court denies a reasonable extension request prior to the deadline to filing a brief under Fed. R. Civ. P. 6(b)(1)(A). Dkt. 216 at 3. Therefore, Plaintiff's blanket assertion that no good cause exists should be disregarded. And while Defendants believe that the requested extension is appropriate in the circumstances here, Defendants of course defer to this Court's judgment if it believes a shorter extension than requested is warranted.

4. Plaintiff also makes the strange argument that Defendants' contemplated motion to dismiss for lack of jurisdiction “should not have been afforded a priority” over responding to his motion, Dkt. 216 at 2, but the Seventh Circuit has made clear that a “jurisdictional issue must be resolved first,” *Crawford v. United States*, 796 F.2d 924, 928 (7th Cir. 1986). Since Plaintiff does not even know what that motion will argue, he can only speculate that it entails “a frivolous attempt

to challenge the Seventh Circuit's mandate." Dkt. 216 at 2.

5. Finally, Plaintiff argues that his motion to add additional plaintiffs is a "routine motion," Dkt. 216 at 3-4, but Defendants will explain in their response why that is not the case here. That said, such argument on the merits is better suited for the briefing on the merits of Plaintiff's motion to add additional plaintiffs and not in a motion for extension of time.

WHEREFORE, Defendants respectfully request that the Court extend the time to respond to Plaintiff's Opposed Motion to Add Additional Plaintiffs and File Amendment to Complaint, Dkt. 202, up to and including, January 14, 2025.

Respectfully submitted,

**EILEEN O'NEILL BURKE**

State's Attorney of Cook County

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**CERTIFICATE OF SERVICE**

The foregoing Motion has been electronically filed on December 6, 2024. I certify that I have caused the foregoing Motion to be served on all counsel of record via CM/ECF electronic notice on December 6, 2024.

*s/ Christina Faklis Adair*  
Christina Faklis Adair