

**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>	)	
	)	Case No. 17-cv-7135
v.	)	
	)	Hon. Martha M. Pacold
SHERIFF OF COOK COUNTY and	)	Magistrate Hon. David Weisman
COOK COUNTY, ILLINOIS	)	
	)	
<i>Defendants.</i>	)	
	)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO SUBMIT REPLY IN SUPPORT OF MOTION TO DISMISS**

Defendants, SHERIFF OF COOK COUNTY, and COOK COUNTY, ILLINOIS, by their attorney EILEEN O'NEILL BURKE, State's Attorney of Cook County, through her Special Assistant State's Attorneys, JOHNSON & BELL, LTD., respectfully request a two-week extension of time to submit a reply brief in support of their motion to dismiss. In support of their motion, Defendants state as follows:

1. On March 25, 2025, the Court entered a briefing schedule on Defendants' motion to dismiss. (Minute Entry, ECF No. 232.) The Court ordered that Plaintiff's response is due by April 8, 2025, and Defendants' reply is due by April 15, 2025. (*Id.*)
2. On April 8, 2025, Plaintiff filed his response. (Resp., ECF No. 233.)
3. Defendants seek a short, two-week extension of time, until April 29, 2025, to submit a reply brief in support of Defendants' motion to dismiss.
4. Undersigned counsel, who will be preparing the reply brief, will be out of the office the week of April 14<sup>th</sup> for pre-planned time off. Further, although undersigned counsel has been counsel of record for Defendant Sheriff Dart since earlier in the case, the Cook County State's

Attorney's Office has been handling the case while it was on appeal. Now that the case is back in the district court, undersigned counsel needs an additional week after returning from pre-planned time off to review the record and procedural posture of this case since the time the case was on appeal. After the reply brief is drafted, the client will also need time to review it before filing.

5. This motion is not brought for the purpose of delay but rather to provide Defendants additional time and opportunity to adequately prepare a reply brief.

6. Defendants shared a draft of this motion with Plaintiff's counsel, who stated that he does not oppose the motion.

WHEREFORE, Defendants SHERIFF OF COOK COUNTY, and COOK COUNTY, ILLINOIS, respectfully request that this Honorable Court grant a short, two-week extension of time, until April 29, 2025, to submit a reply brief in support of Defendants' motion to dismiss.

Respectfully submitted,

EILEEN O'NEILL BURKE  
State's Attorney of Cook County

Dated: April 10, 2025

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

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