

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

William Carter,)
Plaintiff,)
) No. 17-cv-7241
-vs-)
) (Judge Hunt)
City of Chicago, et al.,)
)
)
Defendants.)

**AGREED MOTION TO HOLD DEPOSITION OF DEFENDANT
MOHAMMED AFTER FACT DISCOVERY DEADLINE**

Plaintiff, by counsel and with the agreement of defendant Mohammed, moves the Court to allow the parties to hold the additional deposition of defendant Mohammed on January 7, 2025, after the fact discovery deadline of December 31, 2024.

Grounds for this motion are as follows:

1. On December 12, 2024, the Court resolved the parties' dispute on the scope of defendant Mohammed's additional deposition.
2. Because of the professional and personal commitments of all counsel involved in this case, plaintiff and defendant Mohammed have agreed, subject to the approval of the Court, to hold the additional deposition on January 7, 2025, which is after the current fact discovery deadline of December 31, 2024. (ECF No. 183.)

3. Plaintiff and defendant Mohammed respectfully request that the Court approve their agreement and order that the deposition may proceed on January 7, 2025.

Respectfully submitted,

/s/ Joel A. Flaxman
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