

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

Leoncio Elizarrri, et al.,)	
)	
)	
<i>Plaintiff,</i>)	
)	No. 17-cv-8120
-vs-)	
)	(Judge Seeger)
Sheriff of Cook County and Cook)	
County, Illinois,)	
)	
<i>Defendants.</i>)	

**PLAINTIFFS' MOTION TO AUTHORIZE ONE
DEPOSITION BEYOND DISCOVERY DEADLINE**

Plaintiffs move the Court to extend to February 28, 2021 the time in which the parties may complete the deposition of Khara Coleman.

Grounds for this motion are as follows:

1. Khara Coleman, an Assistant General Counsel to the Sheriff, provided sworn answers and amended answers on behalf of defendant Sheriff in response to plaintiff's second set of interrogatories.
2. Plaintiffs served a notice of deposition on defendant Sheriff requesting that it produce Ms. Coleman on January 15, 2021.
3. The parties disagree about whether plaintiffs are entitled to depose Ms. Coleman and, if so, about the scope of her deposition. The parties are following Local Rule 37.2 to attempt to resolve their differences. These negotiations have taken longer than expected.

4. Plaintiffs plan to present any contested issues for resolution by the Court by February 5, 2021.

5. Counsel for the parties have conferred about this motion. Defense counsel agrees that the facts are accurately stated.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
ARDC No. 08830399
Joel A. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
attorneys for plaintiff