

043133/19344/MHW/REN/SLB

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JOHNNY JONES,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC. and
DR. MARSHALL JAMES,

Defendants.

Case Number 17 cv 8218

Honorable Mary M. Rowland

DEFENDANTS' WEXFORD HEALTH SOURCES, INC. AND DR. MARSHALL JAMES
UNOPPOSED MOTION FOR EXTENSION OF TIME

Defendants, WEXFORD HEALTH SOURCES, INC. and DR. MARSHALL JAMES, by and through one of their attorneys, Sandra L. Byrd of CASSIDAY SCHADE LLP, and for their *Unopposed* Motion for Extension of Time, state as follows:

1. This matter arises from a claim by Plaintiff that he did not receive appropriate care related to his physical health while incarcerated at Sheridan Correctional Center. Plaintiff has made allegations of deliberate indifference to his serious medical needs and medical malpractice against Defendants.

2. On May 12, 2020 this Court entered a summary judgment briefing schedule instructing Defendants to file their Motion for Summary Judgment by June 29, 2020. [Dkt. #86]. This deadline recognized the extensions that had previously been entered by General Order No. 20-0012 and its amendments. *Id.*

3. Defendants' are seeking a one week extension to file their Motion for Summary Judgment due to personal circumstances beyond the control of Defendants' counsel, Ms. Byrd.

4. This is the first extension related to the Motion for Summary Judgment that has been requested.

5. Prior to seeking this extension, counsel for Defendants conferred with Plaintiff's counsel who does not oppose the requested extension.

6. This extension is sought in good faith and is not sought to unnecessarily delay these proceedings. No party will be prejudiced by the granting of this extension.

7. As such, Defendants request that the deadline to file their Motion for Summary Judgment be extended to July 6, 2020, that the deadline for Plaintiff to respond be extended to August 3, 2020 and that Defendants' deadline to reply be extended to August 17, 2020.

WHEREFORE, Defendants request that this honorable Court enter an order extending the Summary Judgment briefing deadlines as set forth above.

Respectfully submitted,

WEXFORD HEALTH SOURCES, INC. and DR.
MARSHALL JAMES

By: Sandra L. Byrd

Sandra L. Byrd
ARDC No. 6237865
CASSIDAY SCHADE LLP
222 West Adams Street, Suite 2900
Chicago, IL 60606
(312) 641-3100
(312) 444-1669 – Fax
sbyrd@cassiday.com

*One of the Attorneys for Wexford Health
Sources, Inc. and Dr. Marshall James*

CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2020 I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, Eastern Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ Sandra L. Byrd

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