

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

Keith Smith,)
)
)
 Plaintiff,)
)
)
 -vs-) No. 18-cv-4918
)
)
City of Chicago and Chicago) (*Judge Kendall*)
Police Officers Ranita Mitchell)
and Herman Otero,)
)
)
 Defendants.)

**AGREED MOTION TO EXTEND
TIME TO COMPLETE DISCOVERY**

Plaintiff, by counsel and with the agreement of defendants, moves the court to extend by 60 days, to August 15, 2023, the time in which the parties may complete discovery. Grounds for this motion are as follows:

1. On November 22, 2022, the Court set June 16, 2023 as the close of fact discovery. ECF No. 82.
2. The parties have exchanged written discovery and plaintiff was deposed on May 24, 2023.
3. Defendants Mitchell and Otero responded to written discovery on March 10, 2023, but required until May 22, 2023 to produce responsive documents.

4. Now that the documents have been produced, plaintiff will depose defendants Mitchell and Otero and two other police officers in June.

5. Additional time is required to complete these depositions and other discovery.

6. Plaintiff's counsel shared a copy of this motion with defendant counsel on May 24, 2023, and plaintiff's counsel is authorized to state that defendants agree to this motion.

It is therefore respectfully requested that the Court extend by 60 days, to August 15, 2023, the time in which the parties may complete discovery.

Respectfully submitted,

/s/ Joel A. Flaxman
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