

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

Goleather Jefferson, )  
Plaintiff ) No. 18-cv-8182  
-vs- ) (Judge Hunt)  
City of Chicago, et al. )  
Defendants )

**JOINT MOTION FOR 14-DAY EXTENSION TO COMPLETE  
TWO REMAINING FACT DEPOSITIONS**

Plaintiff Goleather Jefferson and the defendants, by their undersigned counsel, jointly move for a 14-day extension of the discovery period, to June 16, 2025, to complete two remaining fact depositions: Willie Martin and Assistant Public Defender Kevin Ochalla. In support of the motion, the parties state as follows:

1. Fact discovery is set to close on June 2, 2025.
2. The only remaining fact discovery consists of the depositions of Mr. Martin and Mr. Ochalla. The parties have attempted to complete the depositions within the existing discovery period but have been unable to do so.
3. Mr. Martin is a plaintiff in his own lawsuit arising out of the same arrest (19 cv 1097) pending before Judge Rowland, in which he is represented by the law firm of Loevy & Loevy. Mr. Martin's counsel

has requested an extension to allow time to consult with and prepare Mr. Martin for his deposition, which will be taken for purposes of both this case and his own lawsuit. Counsel has advised that they can produce Mr. Martin by June 16, 2025.

4. Mr. Ochalla is currently a Cook County Assistant Public Defender and has requested that his deposition be scheduled on June 13, 2025, due to his calendar and that of counsel for the Public Defender's Office that will represent him at the deposition.
5. All parties are in agreement to this short and limited extension to the discovery cutoff date, if the Court permits.
6. The extension is not requested for any purpose of delay but only to accommodate the schedules of the witnesses and all relevant counsel.

WHEREFORE, the parties jointly move for an extension of 14 days, to June 16, 2025, to complete the depositions of Mr. Miller and Mr. Ochalla.

Respectfully submitted,

/s/ Joel A. Flaxman (by consent)

Joel A. Flaxman

ARDC No. 6292818

Kenneth N. Flaxman

200 S Michigan Ave, Ste 201

Chicago, IL 60604

(312) 427-3200

*attorneys for plaintiff*

/s/ Paul A. Michalik (by consent)  
Daniel M. Noland  
Terrence M. Burns  
Paul A. Michalik  
Katherine C. Morrison  
Daniel J. Burns  
Dhaviella N. Harris  
Burns Noland LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
(312) 982-0090  
*attorneys for defendants Chicago, Cline, and Kirby*

/s/ Brian P. Gainer (by consent)  
Brian P. Gainer  
Monica Burkoth  
Lisa M. McElroy  
Johnson & Bell, Ltd.  
33 West Monroe St., Ste 2700  
Chicago, IL 60603  
(312) 372-0770  
*attorneys for defendant Ronald Watts*

/s/ Sean M. Sullivan  
Eric S. Palles  
Sean M. Sullivan  
Lisa Altukhova  
Mohan Groble Scolaro, PC  
55 West Monroe St., Ste 1600  
Chicago, IL 60603  
(312) 422-9999  
*attorneys for defendant Mohammed*

/s/ Jason M. Marx (by consent)  
Special Assistant Corporation Counsel  
Andrew M. Hale  
Anthony E. Zecchin  
Jason M. Marx  
Kelly M. Olivier  
Hannah Beswick-Hale  
Hale & Monico LLC

53 West Jackson Blvd., Ste 334  
Chicago, IL 60604  
(312) 341-9646  
*attorneys for remaining defendants*