

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

Goleather Jefferson,)	
)	
<i>Plaintiff,</i>)	
v.)	
)	Case No. 18 CV 8182
City of Chicago, Ronald Watts,)	
Phillip Cline, Debra Kirby, Alvin)	Honorable LaShonda A. Hunt
Jones, Manuel Leano, Kallatt)	
Mohammed, Douglas Nichols, Jr.,)	
and Elsworth J. Smith Jr.,)	
)	
<i>Defendants.</i>)	

NOTICE OF MOTION

TO: All counsel of record.

Please take notice that on **June 3, 2025 at 10:00 a.m.**, I shall appear before the Honorable Judge LaShonda A. Hunt in Courtroom 1425 at Everett McKinley Dirksen United States Courthouse, 219 South Dearborn Street, Chicago, IL 60604, and present **JOINT MOTION FOR 14-DAY EXTENSION TO COMPLETE TWO REMAINING FACT DEPOSITIONS**

Respectfully submitted,

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

/s/ Sean M. Sullivan
Special Assistant Corporation Counsel
One of the Attorneys for Individual Defendants

CERTIFICATE OF SERVICE

I, Sean M. Sullivan, an attorney, hereby certify that on May 29, 2025, I electronically filed the foregoing, Notice of Motion, with the Court's CM/ECF system, which simultaneously sent an electronic copy of the same to all Counsel of Record.

/s/ Sean M. Sullivan