

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

Margaret Thomas, as special )  
administrator for Nephus Thomas, )  
deceased, )  
 )  
*Plaintiff* ) 19-cv-133  
 )  
-vs- ) (*Judge Pallmeyer*)  
 )  
City of Chicago, et al., )  
 )  
 )  
*Defendants* )

## JOINT MOTION FOR EXTENSION

The parties, by counsel, respectfully request that the Court extend by 7 days (to April 7, 2025) the deadline for submission of a status report containing a deposition schedule. Grounds for this motion are as follows:

1. On March 17, 2025, the Court ordered the parties to submit a further report within 14 days, setting forth their deposition schedule.
2. The parties respectfully request an additional 7 days (to April 7, 2025) to submit that report because of counsels' other professional obligations.

Respectfully submitted,

/s/ Joel A. Flaxman  
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 Watts*

/s/ Eric S. Palles (by consent)  
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*