

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

MARGARET THOMAS, as special)
Administrator for NEPHUS THOMAS,)
Deceased,)
)
 Plaintiff,) Case No. 19-cv-133
v.)
) Honorable Judge Pallmeyer
CITY OF CHICAGO, et al.,)
)
 Defendants.)

**DEFENDANT OFFICERS' UNOPPOSED MOTION FOR A LIMITED
EXTENSION OF THE FACT DISCOVERY DEADLINE**

NOW COME Defendant Officers Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Lamonica Lewis, Douglas Nicholas, Jr., and Elsworth Smith, Jr., by and through their attorneys, HALE & MONICO, LLC, and hereby move this Honorable Court to grant a limited extension of fact discovery to conduct the depositions of Plaintiff Margaret Thomas and third-party witness Milton Allison. In support thereof, Defendants state:

1. On January 6, 2025 this Honorable Court ordered fact discovery closed by July 3, 2025. Dkt. 104.
2. The parties have been working diligently to complete fact discovery by the current deadline. The parties have completed all necessary depositions, but for the depositions of Plaintiff Magaret Thomas and third-party witness Milton Allison.¹

¹ Defendants also desire to take the deposition of third-party witness Terrence Moye. However, Mr. Moye is a Plaintiff in his own case, and the parties expect Mr. Moye to be deposed in his own case, and as a witness in this matter, later in 2025. Defendants are not seeking an extension of discovery for the purpose of deposing Mr. Moye.

3. The depositions of Ms. Thomas and Mr. Allison were previously set in May 2025, but continued several times, due to unavailability of counsel in many other “Watts cases.”
4. The most recent continuance of the depositions occurred in late June 2025, as all parties continue to focus on global settlement discussions. The next settlement conference is scheduled for July 2, 2025 at 11:00a.m. with Magistrate Judge Valdez.
5. As a result, Defendants respectfully request a brief continuance of the fact discovery deadline, until August 4, 2025, to complete the depositions of Margaret Thomas and Milton Allison.
6. This unopposed motion is not being brought to delay these proceedings and will not prejudice any party. This is the first request for an extension of time any of the parties have sought.

WHEREFORE, all parties respectfully request that this Honorable Court grant the above requested relief and for any further relief this Court deems just.

Dated: July 1, 2025.

By: /s/ Jason Marx
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served the foregoing Defendant Officers' Unopposed Motion for a Limited Extension of the Fact Discovery Deadline by filing the same on this Court CM/ECF system on July 1, 2025.

/s/ Jason Marx