

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 19-cv-1717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)
)

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE THEIR
REPLY BRIEFS IN SUPPORT OF THE REPRESENTATIVE MOTIONS TO DISMISS**

Defendant, City of Chicago (the “City”), Philip Cline, Terry Hillard, Dana Starks, Karen Rowen, and Debra Kirby (“Supervisory Officials”), Edward Griffin, John Griffin, Jerrold Bosak, Brian Bolton, Miguel Cabrales, Darryl Edwards, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Jr., Calvin Ridgell Jr., Elsworth J. Smith, Jr., Kenneth Young, John Rodriguez, Lamonica Lewis, Frankie Lane, Katherine Moses-Hughes, Nobel Williams, Curtis Ivy, and Gerome Summers Michael Spaargaren, Matthew Cadman, Kallatt Mohammed, and Ronald Watts (“Defendant Officers”) (collectively “Defendants”), through their respective undersigned counsel, jointly move for an extension of time to February 26, 2021 to file their reply briefs in support of the their Motion to Dismiss Certain Claims in Loevy & Loevy Plaintiffs’ Complaints (Dkt. #170) and their Motion to Dismiss Certain Claims in Flaxman Plaintiffs’ Complaints (Dkt. #173).

1. Rather than filing partial motions to dismiss in each of the coordinated cases, Defendants filed one partial Motion to Dismiss Certain Claims in Loevy & Loevy Plaintiffs’ complaints on December 17, 2020 (Dkt. #170) and one partial Motion to Dismiss Certain Claims in Flaxman Plaintiffs’ Complaints on December 18, 2020 (Dkt. #173).

2. The Loevy & Loevy Plaintiffs and the Flaxman Plaintiffs filed their responses in opposition to the motions on January 15, 2021. (Dkt. #176, 178.)

3. The current deadline for the Defendants' to file their reply briefs in support of their motions is February 5, 2021.

4. Counsel for Defendants who have the responsibility for drafting these reply briefs have been working on a number of briefs due in other matters, including *Wrice v. Byrne*, Case No. 14-cv-05934, *Gibson v. City of Chicago*, Case No. 19-cv-4152, *Weston v. City of Chicago*, Case No. 20-cv-06189, and *Fletcher v. Bogucki*, Case No. 20-cv-04768. Because certain briefs in these other matters have unexpectedly taken a significant amount of Defendants' counsels' time, Defendants request an extension to February 26, 2021 to file their reply briefs in this matter.

5. Counsel for Defendants have conferred with counsel for the Flaxman Plaintiffs and counsel for the Loevy & Loevy Plaintiffs and there is no objection to the relief requested in this motion.

6. This request is not made to unduly delay these proceedings and no prejudice will result to any party by extending the time to file the reply brief because the parties continue to engage in written and oral discovery.

WHEREFORE, Defendants respectfully request that this Court grant this unopposed motion and extend the time for Defendants to file their reply briefs in support of their motions to dismiss to February 26, 2021.

Dated: February 4, 2021

Respectfully submitted

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CERTIFICATE OF SERVICE

I, Allyson L. West, an attorney, hereby certify that February 4, 2021, I caused to be filed with the Clerk of the Court's CM/ECF system a copy of this motion, which simultaneously served copies on all counsel of record via electronic notification.

/s/ Allyson L. West