

**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  
)  
) *This Document Relates to All Cases*  
)

**DEFENDANTS' JOINT MOTION FOR EXTENSION  
OF TIME TO FILE ANSWERS TO COMPLAINTS IN CONSOLIDATED  
PROCEEDINGS AND THEIR REPLY BRIEFS IN SUPPORT OF THE  
REPRESENTATIVE MOTIONS TO DISMISS (UNOPPOSED)**

All Defendants in the Watts Coordinated Pretrial Proceedings, through their undersigned counsel, for their unopposed joint motion, respectfully request (1) an extension of time to file answers to the complaints in the cases consolidated under Master Docket Case No. 19 C 1717, and (2) a short extension of time to file their replies in support of their representative motions to dismiss, and in support, state:

1. Defendants' answers to Plaintiffs' complaints in the cases consolidated under the above-referenced Master Docket are due February 26, 2021. (Dkt. #163). There are approximately 67 cases in which Defendants' answers are required. Given the large number of cases involved, Defendants initially proposed filing the answers on a rolling basis, with all answers filed by the end of February 2021.

2. Unanticipated departures in the City's Law Department and the corresponding need to reassign supervisory responsibilities for the Watts coordinated proceedings have resulted in certain delays, including the preparation and approval of a Joint Stipulation that directly pertains to Defendants' answers. That Joint Stipulation has now been filed. (Dkt. #186).

3. In light of the unanticipated delay, Defendants jointly request that the due date for their answers be extended to April 30, 2021. Again, to the extent possible, Defendants will file answers on a rolling basis based on the age of the case, addressing the older-filed matters before the more recent filings.

4. Counsel for Defendant City, Paul Michalik, has conferred with counsel for the Flaxman Plaintiffs and counsel for the Loevy & Loevy Plaintiffs, and there is no opposition to this extension requested by Defendants.

5. Rather than require the filing of partial motions to dismiss in each of the coordinated cases, this Court approved the parties' joint plan wherein Defendants filed one partial Motion to Dismiss Certain Claims in Loevy & Loevy Plaintiffs' complaints (Dkt. #170) and one partial Motion to Dismiss Certain Claims in Flaxman Plaintiffs' Complaints (Dkt. #173). The Loevy & Loevy Plaintiffs and the Flaxman Plaintiffs filed their responses in opposition to the motions on January 15, 2021. (Dkt. #176, 178.) The current deadline for the Defendants' to file their reply briefs in support of their representative motions is February 26, 2021. (Dkt. #185).

6. Defendants request a further short extension of seven days, to March 5, 2021, to file their reply briefs in this matter.

7. Counsel for Defendant City, Paul Michalik, has conferred with counsel for the Flaxman Plaintiffs and counsel for the Loevy & Loevy Plaintiffs, and plaintiffs have no opposition to this requested extension.

8. These requested extensions are not made to unduly delay these proceedings. No prejudice will result to any party by extending the time to file the answers and/or reply briefs, as the parties have continued to engage in written and oral discovery.

WHEREFORE, Defendants request that this Court enter an order extending the due date for their answers to the complaints in the Watts Coordinated Proceedings to April 30, 2021 and extending the due date for their reply briefs in support of the representative motions to dismiss to March 5, 2021.

Dated: February 23, 2021

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on **February 23, 2021**, I electronically filed the foregoing **Defendants' Unopposed Joint Motion for Extension of Time** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record via the Court's CM/ECF system.

s/ Paul A. Michalik