

**UNITED STATES DISTRICT COURT
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 Documents Relates to All Cases*
)

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

All Defendants in the Watts Coordinated Pretrial Proceedings, through their undersigned counsel, for their unopposed joint motion, respectfully request an additional short extension of time to file their replies in support of their representative motions to dismiss, and in support, state:

1. On February 24, 2021, the Court granted Defendants' request to extend their time in which to file their replies in support of their representative motions to dismiss to March 5, 2021. (Dkt. #188.) On February 25, 2021, a very close family friend of Amy A. Hijjawi, who is the defense counsel with primary responsibility for drafting the replies, passed away from Covid.

2. Ms. Hijjawi requires an additional short extension of time to complete the replies, and requests that the due date for the replies be extended to March 16, 2021.

3. Ms. Hijjawi has conferred with counsel for the Flaxman Plaintiffs and counsel for the Loevy & Loevy Plaintiffs, and they have no objection to this request for an additional extension.

4. No prejudice will result to any party by extending the time to file the 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 reply briefs in support of the representative motions to dismiss to March 16, 2021.

Dated: March 2, 2021

Respectfully submitted,

By: /s/ Paul A. Michalik
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CERTIFICATE OF SERVICE

I hereby certify that on **March 2, 2021**, I electronically filed the foregoing **Defendants’ Unopposed 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/ Amy A. Hijjawi