

**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-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)
)

**DEFENDANT OFFICERS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS' MOTION TO QUASH SUBPOENAS TO ILLINOIS
DEPARTMENT OF CORRECTIONS FOR PLAINTIFFS' PHONE CALLS**

Defendant Officers Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nicholas, Jr.,
Manuel S. Leano, Brian Bolton, Kenneth Young, Jr., David Soltis, Elsworth J. Smith Jr., Jerome
Summers, Jr., John Rodriguez, Lamonica Lewis, Frankie Lane, Katherine Moses-Hughes, Darryl
Edwards, and Noble Williams, by and through their attorneys, Hale & Monico, LLC, hereby move
unopposed for an extension of time to file their response to Plaintiffs' Motion to Quash Subpoenas
to Illinois Department of Corrections for Plaintiffs' Phone Calls [Dkt. 649], as follows:

1. On January 5, 2024, Plaintiff's filed their Motion to Quash Subpoenas to Illinois Department of Corrections for Plaintiffs' Phone Calls. Dkt. 649.
2. On January 5, 2024, this Court ordered Defendants' response due by 1/19/24 and Plaintiffs' reply, if any, due by 1/26/24. Dkt. 650.
3. In order to properly respond, Defendants are in need of a brief extension of time to 1/22/24. If granted, Defendants request Plaintiffs' reply be due 1/29/24.
4. The undersigned counsel contacted Plaintiffs' counsel on 1/17/24 regarding said extension, and Plaintiffs' counsel did not object.
5. No party will suffer undue prejudice due to this brief extension of time.

WHEREFORE, Defendants respectfully request this Honorable Court order that Defendants' Response to Plaintiffs' Motion to Quash Subpoenas to Illinois Department of Corrections for Plaintiffs' Phone Calls be due 1/22/24 and Plaintiffs' reply be due 1/29/24.

Respectfully submitted,

By: /s/ Jason Marx.
Special Assistant Corporation Counsel
One of the Attorney for All Defendant Officers
except for Cadman, Spaargaren, Ridgell,
Mohammed, and Watts

Andrew M. Hale
Amy A. Hijawi
Anthony E. Zecchin
Kelly M. Olivier
William E. Bazarek
Jason M. Marx
Hale & Monico, LLC
53 W. Jackson Blvd., Suite 334
Chicago, IL 60604
(312) 341-9646