

**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
)

**PLAINTIFFS' UNOPPOSED MOTION FOR TWO-DAY EXTENSION AND
LEAVE TO FILE THEIR REPLY EXCEEDING THE PAGE LIMIT**

Plaintiffs respectfully request a two-day extension to file their Reply for their Motion to Quash Defendants' IDOC Subpoenas and leave to file the Reply exceeding the page limitation as specified in this Honorable Court's Standing Order, stating in support as follows:

1. On January 5, 2024, Plaintiffs moved to quash Defendant Officers' subpoenas issued to the Illinois Department of Corrections ("IDOC") seeking several phone calls of nine test-case Plaintiffs. Dkt. 649.
2. On that same day, the Court set a briefing schedule for Plaintiffs' motion, ordering Defendants' response due by January 19 and Plaintiffs' reply by January 26, 2024. Dkt. 650.
3. On January 17, 2024, Defendants requested a brief extension of time to file their response, which Plaintiffs did not oppose. Dkt. 661.
4. Subsequently, the Court granted Defendants' motion and reset the response deadline for January 22 and Plaintiffs' reply deadline for January 29. Dkt. 662.
5. On January 23, 2024, Defendant Officers filed a 28-page response to Plaintiffs' motion to quash with 40 exhibits. Dkt. 666.

6. In order to adequately reply to Defendants' response, Plaintiffs need an additional two days to file their reply.

7. Additionally, pursuant to this Court's Standing Order, "Motion Practice," reply briefs must not exceed 10 pages without approval of the court.

8. Plaintiffs attempted to stay within the page limit as outlined in this Standing Order, but they will not be able to respond to Defendant Officers' numerous arguments in a 10-page brief. Therefore, Plaintiffs are seeking leave to file a 15-page brief.

9. Plaintiffs' counsel conferred with counsel for Defendant Officers represented by Hale & Monico, and counsel indicated that they do not oppose this motion.

10. For all the foregoing reasons, Plaintiffs respectfully request that this Honorable Court grant their motion for a two-day extension to file their reply and for leave to file said reply in excess of 10 pages.

Respectfully Submitted,

/s/ Gianna Gizzi
*One of the attorneys for the Loevy & Loevy
Plaintiffs*

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CERTIFICATE OF SERVICE

I, Gianna Gizzi, an attorney, hereby certify that January 26, 2024, I caused to be filed with the Clerk of the Court's CM/ECF system a copy of the PLAINTIFFS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE THEIR REPLY AND FOR LEAVE TO FILE A 15-PAGE REPLY IN EXCESS OF THE PAGE LIMIT, which simultaneously served copies on all counsel of record via electronic notification.

/s/ Gianna Gizzi