

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: WATTS COORDINATED)	No.19 C 1717
PRETRIAL PROCEEDINGS)	
)	Judge Valderamma
)	
)	Magistrate Judge Finnegan

**THE UNITED STATES' AGREED MOTION TO
EXTEND THE BRIEFING SCHEDULE FOR DEFENDANTS' MOTION TO COMPEL**

The United States of America, by its attorney, Morris Pasqual, Acting United States Attorney for the Northern District of Illinois, with the agreement of the moving defendants, requests that the court grant a two-week extension of the briefing schedule regarding defendants' motion to compel testimony regarding allegations of FBI agent misconduct (dkt. no 689), and states as follows in support:

1. On January 29, 2024, the court entered an agreed briefing schedule for the defendants' motion to compel testimony regarding allegations of FBI agent misconduct. The order gave the moving defendants until February 16, 2024, to file their motion, the United States until March 1, 2024, to respond, and defendants until March 15, 2024, to reply.

2. At the time that the United States agreed to this schedule, the special assistant U.S. Attorney handling this matter was unaware that the key agency counsel for FBI would be away from the office and unavailable to assist with the response brief during most of the time allotted for that response.

3. For this reason, and to allow it time to prepare an appropriate response brief, the United States seeks an extension of the briefing schedule by two weeks for both the United States and the moving defendants.

4. The moving defendants agree to the relief requested by this motion.

WHEREFORE, the United States requests that court give it until March 15, 2024, to file a response brief to defendants' motion and give the moving defendants until March 29, 2024, to file their reply brief.

Respectfully submitted,

MORRIS PASQUAL
Acting United States Attorney

By: s/ Donald R. Lorenzen
DONALD R. LORENZEN
Special Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
(312) 353-5330
donald.lorenzen@usdoj.gov