

**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' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE
ANSWERS TO COMPLAINTS IN THE COORDINATED PROCEEDINGS**

All Defendants in the Watts Coordinated Pretrial Proceedings, through their undersigned counsel, for their unopposed motion, respectfully request an additional extension of time to file answers to complaints in the cases coordinated under Master Docket Case No. 19 C 1717, and in support, state:

1. Defendants' answers to Plaintiffs' complaints in the cases coordinated under Master Docket No. 19 C 1717 are due March 1, 2024. Dkt. #621. There are over 170 individual cases that are part of the coordinated proceedings in which answers are required.

2. Defendants have been filing their answers on a rolling basis and will continue to do so. However, due to the time-consuming nature of preparing answers on behalf of multiple defendants and the volume of cases that comprise these coordinated proceedings, Defendants jointly request that the due date to complete their answers in all cases be extended to May 30, 2024.

3. Moreover, the parties have identified 19 “test cases” that are being litigated on a separate discovery track. Dkt. 393, Jan. 20, 2023, Status Report; Dkt. 395, January 23, 2023, Minute Order. Although the parties’ discovery efforts are focused on preparing the “test cases” for trial, Defendants will continue to file answers to the non-test cases on a rolling basis.

4. In addition, *Alvin Waddy v. City of Chicago, et al.*, 2019 L 10035, is set for trial on April 21, 2024, in Cook County Circuit Court. The *Waddy* case involves many of the same parties and counsel working on cases in these Coordinated Proceedings. Preparation for trial in *Waddy* has and will continue to require significant amounts of time of defense counsel.

5. Furthermore, the parties will soon begin conducting expert discovery in *Baker v. City of Chicago, et al.*, 16-cv-8940. This case is set for trial on January 8, 2025.

6. Counsel for the Defendant Officers has conferred with counsel for the Plaintiffs, and there is no opposition to the extension requested by Defendants.

7. This request for an extension of time is not made to unduly delay these proceedings. No prejudice will result to any party by extending the time to file the answers in light of the court's stay of discovery in non-test case, which the parties agreed to.

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 May 30, 2024.

Dated: February 29, 2024

Respectfully submitted,

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