

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 1:19-cv-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE TO DEFENDANT OFFICERS' CORRECTED SUPPLEMENT

Respondent Cook County State's Attorney's Office ("CCSAO"), by its attorney, Kimberly M. Foxx, Cook County State's Attorney, through her Assistant State's Attorneys, Lyle Henretty and Jessica L. Wasserman, hereby requests an extension of time to file a response to Defendant Officers' Corrected Supplement to their Response to the Cook County State's Attorney's Office's Motion to Quash the Subpoena for Depositions of Eric Sussman, Joseph Magats, Mark Rotert, and Nancy Adduci. In support, CCSAO states as follows:

1. CCSAO's response is currently due June 17, 2024.
2. On May 20, 2024, Defendant Officers filed a supplement to their response to the Cook County State's Attorney's Office's Motion to Quash the Subpoena for Depositions of Eric Sussman, Joseph Magats, Mark Rotert, and Nancy Adduci. Dkt. 731.
3. On May 23, 2024, the Defendant Officers moved to correct their response instantter. Dkt. 734.
4. Defendant Officers' corrected supplement is based on alleged disclosures made to the Civilian Office of Police Accountability (COPA). On Friday, May 24, 2024, ASA Wasserman requested access to the relevant COPA files from Defendant Officers' counsel.

5. Defendant Officers' counsel informed ASA Wasserman that there would be a delay in providing the COPA files due to confidentiality concerns. The COPA files were ultimately produced to ASA Wasserman on June 4, 2024.

6. On June 12, 2024, this Court granted Defendant Officers' motion to file a corrected supplement instant and instructed Defendants to file the corrected supplement as a separate entry on the docket. Dkt. 761.

7. On June 14, 2024, counsel for the Defendant Officers and counsel for the CCSAO conferred on the issues raised in the corrected supplement. Counsel for the Defendant Officers informed counsel for the CCSAO that he planned to file the corrected supplement on Monday, June 17, 2024.

8. Counsel for Defendant Officers filed the corrected supplement on Monday, June 17, 2024. Dkt. 768.

9. Due to other professional obligations, counsel for Cook County will need additional time to review the corrected supplement and relevant materials and prepare their response.

10. Counsel for Cook County conferred with counsel for the Defendant Officers in this case, who has no objection to this request.

11. Accordingly, Cook County requests additional time until July 1, 2024, to file its response to the corrected supplement.

12. Counsel for the Defendant Officers requests until July 15, 2024 to file his reply.

WHEREFORE, Cook County respectfully requests that this Honorable Court extend the Defendants' deadline to respond to July 1, 2024, and for all other appropriate relief.

Dated: June 17, 2024

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

/s/ Jessica L. Wasserman
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CERTIFICATE OF SERVICE

I, Jessica L. Wasserman, hereby certify that on June 17, 2024, I have caused a true and correct copy of Unopposed Motion for Extension of Time be sent via e-filing to all counsel of record in accordance with the rules regarding the electronic filing and service of documents.

/s/ Jessica L. Wasserman
Jessica L. Wasserman