

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 Frank U. Valderrama  
 )  
 ) Magistrate Judge Sheila M. Finnegan  
)

**OFFICER DANIEL ECHEVERRIA'S MOTION FOR LEAVE TO LATE FILE OPPOSITION  
TO DEFENDANTS' JOINT MOTION FOR ADDITIONAL DEPOSITION TIME**

Counsel for Office Echeverria seeks permission to file this response that was due Friday, December 13. Counsel received defense counsel's motion on Tuesday, December 10 but had day long schedule conflicts for events in which counsel was participating. Counsel researched and drafted the response on Thursday, but when attempting to file it Friday learned that it is necessary to be admitted to the court. After filing an application, counsel received an account to file at 13:45 AM on Saturday. Counsel and paralegal unsuccessfully sought to file Monday, but were unable to succeed until receiving assistance today from the Court's Helpline. On Monday Counsel sent copies of the response to both parties and the court.

Since this is the second day subsequently available and there is no prejudice to any parties, counsel submits there is good cause to accept this filing.

Respectfully submitted,

s/s Thomas Devine  
Thomas Devine  
Counsel for Mr. Echeverria

Dated: December 17, 2024