

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Germin Sims and Robert Lindsey,)
v.)
Plaintiffs,)
City of Chicago, Ronald Watts,)
Phillip Cline, Debra Kirby, Brian)
Bolton, Robert Gonzalez, Alvin)
Jones, Manuel Leano, Lamonica)
Lewis, Kallatt Mohammed,)
Douglas Nichols Jr., and Elsworth Smith Jr.,)
Defendants.)
Case No. 19-cv-2347
Judge Pallmeyer
Jury Demanded

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE DISPOSITIVE MOTIONS**

Defendants, City of Chicago, Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Elsworth Smith, Jr., Kallatt Mohammed, and Ronald Watts, by their attorneys, for their unopposed motion for an extension of time to file Daubert and dispositive motions, state:

1. On October 15, 2024, this Court ordered that summary judgment motions be filed by May 1, 2025. (Dkt. 81)
2. Counsel for Defendants and Counsel for Plaintiff have been working cooperatively and diligently to complete fact discovery. Nonetheless, under the current agreed-upon schedule, oral depositions will be concluded on May 8, 2025. Additionally, because the Defendant City's motion for summary judgment will be informed by the opinions of Plaintiff's experts, Plaintiff's counsel has agreed to supplement any disclosures concerning his *Monell*

experts by May 1, 2025.

3. Defendants have communicated with Plaintiff's counsel who advised Plaintiff does not oppose the requested extension of time. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, Defendants respectfully request that this Court grant the Defendants' unopposed motion to extend the time to file summary judgment to and including June 2, 2025, and set a briefing schedule as follows:

- a.) motions for summary judgment, statements of undisputed material facts, and Daubert motions implicating summary judgment to be filed by June 2, 2025;
- b.) Responses to summary judgment and Daubert motions, response to statements of undisputed material facts, and statements of additional facts to be filed by June 30, 2025; and
- c.) Replies to summary judgment and Daubert motions, and response to statements of additional facts, to be filed by July 31, 2025.

Dated: April 21, 2025

Respectfully Submitted,

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