

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

UNOPPOSED MOTION TO STAY

Petitioning-Special Representative Johnny Spencer, by counsel and without opposition by defendants, respectfully moves the Court to stay discovery for 45 days until June 3, 2021, to allow the Court to rule on Mr. Spencer's pending motion for appointment as special administrator and to allow the parties to discuss settlement.

Grounds for this motion are as follows:

1. The original plaintiff, Derrick Schaeffer, died on April 4, 2021.
2. Mr. Schaeffer's father, Johnny Spencer, has filed a motion seeking appointment as special administrator to continue this suit for the benefit of his son's estate.
3. While Mr. Spencer's motion is pending, undersigned counsel does not represent a party in the litigation.

4. Accordingly, Mr. Spencer respectfully requests a stay of discovery for 45 days.

5. Mr. Schaeffer's unfortunate passing may also change the parties' settlement positions, and a 45-day stay will allow the parties to confer about the possibility of settlement.

6. Defendants do not oppose this motion.

It is therefore respectfully requested that the Court stay discovery for 45 days until June 3, 2021.

Respectfully submitted

/s/ Joel A. Flaxman
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