

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

Derrick Schaeffer,)	
)	
Plaintiff,)	No. 19-cv-7711
)	
-vs-)	Judge Robert M. Dow Jr.
)	
City of Chicago, et al.)	Magistrate Judge Jeffrey T. Gilbert
)	
Defendants.)	

**DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION
OF TIME TO RESPOND TO PLAINTIFF’S MOTION TO COMPEL**

Defendants James Brandon, Mario Perez, Jocelyn Gregoire-Watkins, and James Kinsey, by and through one of their attorneys, Evan K. Scott, Assistant Corporation Counsel for the City of Chicago (“Defendant Officers”), and Defendant City of Chicago, by and through its attorney, Mark A. Flessner, Corporation Counsel for the City of Chicago, (collectively “Defendants”) respectfully request that this Court extend the time for all defendants to respond to Plaintiff’s Motion to Compel, up to and including September 18, 2020. In support of this motion, Defendants state as follows:

1. Plaintiff Derrick Schaeffer’s (“Plaintiff”) above-captioned civil lawsuit stems from events surrounding Plaintiff’s arrest and prosecution on February 1, 2017. ECF Dkt. No. 1.
2. On August 19, 2020, the Court set a briefing schedule which directed Defendants to file a response to Plaintiff’s Motion to Compel on September 4, 2020, Plaintiff to reply by September 11, 2020, with a possible ruling date set for September 30, 2020. ECF Dkt. No. 53.
3. Due to scheduling issues and congruent deadlines, Defendants are unable to provide a response to the motion at this deadline, despite ardent efforts to do so.

4. Defendants request that this extension be granted as to all named Defendants. Defendants further request a corresponding extension for Plaintiff's reply brief to be due September 25, 2020, and for the possible ruling date to be reset to October 14, 2020 at 11 a.m. or whenever the Court deems most convenient to September.

5. The undersigned counsel emailed Plaintiff's Counsel on September 4, 2020, regarding this motion for extension and Plaintiff responded that he had no objection to this motion.

6. No prejudice will be suffered by any party as a result of the requested extension.

WHEREFORE, Officer Defendants respectfully request that this Court grant all named Defendants an extension of time up to and including September 18, 2020, to file their response to Plaintiff's Motion to Compel and for any further relief this Court deems appropriate and just.

Dated: September 4, 2020

Respectfully submitted,

By: /s/ Evan K. Scott
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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 2020, I served a true and correct copy of the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL** upon Plaintiff, via his attorneys of record, using the CM / ECF system which causes a true and correct copy of the filed documents to be electronically delivered to all electronically registered parties of record.

Respectfully Submitted,

By: /s/ Evan K. Scott
Evan K. Scott
Assistant Corporation Counsel