

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

DERRICK SCHAEFFER,	)	
	)	
Plaintiff,	)	19 C 7711
	)	
v.	)	Judge Robert M. Dow Jr.
	)	
CITY OF CHICAGO, OFFICER JAMES A.	)	Magistrate Judge Jeffrey T. Gilbert
BRANDON #7634, OFFICER MARIO	)	
PEREZ #18936, OFFICER JAMES	)	
KINSEY # 16189, and DETECTIVE	)	
JOCELYN GREGOIRE-WATKINS, #20974,	)	
	)	
Defendants.	)	

**DEFENDANTS' JOINT UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO  
PLAINTIFF'S AMENDED COMPLAINT**

Defendant City of Chicago (“the City”), by and through its attorney, Celia Meza, Acting Corporation Counsel for the City of Chicago, and Defendants James Brandon, Mario Perez, James Kinsey, and Jocelyn Gregoire-Watkins (together, “Defendants”) respectfully requests that this Honorable Court extend the time for all defendants to answer or otherwise plead to Plaintiff’s Amended Complaint to and including January 19, 2021. In support of this motion, Defendants state as follows:

1. Plaintiff Derek Schaeffer (“Plaintiff”) filed an Amended Complaint to this above captioned civil lawsuit on December 21, 2020. *See* ECF Dkt. No. 93.
2. In order to properly prepare and file a responsive pleading, undersigned counsel will need additional time to evaluate new and/or modified allegations in Plaintiff’s Amended Complaint.

3. The undersigned counsel has conferred with Plaintiff's counsel, who did not oppose this motion.

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

**WHEREFORE**, the Defendants respectfully request that this Court grant all named Defendants an extension of time by and including January 19, 2020, to file their answer or otherwise plead to Plaintiff's Amended Complaint and for any further relief this Court deems appropriate and just.

**Dated: January 4, 2020**

Respectfully submitted,

Celia Meza  
Acting Corporation Counsel for the City of Chicago

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 4, 2021 I served the foregoing document upon all counsel of record by filing a copy with the Clerk of the Northern District of Illinois using the Court's electronic filing system.

/s/ Evan K. Scott

Evan K. Scott

Assistant Corporation Counsel