

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

Theresa Kennedy, individually and for others
similarly situated,

Plaintiff,

v.

City of Chicago,

Defendant.

Case No. 20-cv-1440

Hon. Thomas M. Durkin

**DEFENDANT’S AGREED MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO PLAINTIFF’S MOTION FOR LEAVE TO AMEND**

Defendant, the City of Chicago, by and its undersigned counsel, moves the Court to extend the deadline to respond to Plaintiff, Theresa Kennedy’s Motion for Leave to Add Plaintiffs and to File Amendment to Amended Complaint (“Motion”) (Dkt. 148), from March 14, 2023 to March 28, 2023. In support thereof, the City states:

1. On February 17, 2023, the Court entered a Minute Order setting a briefing schedule for Plaintiff’s Motion as follows: (1) Plaintiff to file her Motion on or before February 28, 2023; (2) the City to respond on or before March 14, 2023; and (3) Plaintiff to reply on or before March 23, 2023. (Dkt. 147.)

2. Plaintiff timely filed her Motion on February 28, 2023. (Dkt. 148.)

3. The City has been diligently working on its opposition but believes an extension of time is necessary to adequately address the arguments raised in Plaintiff’s Motion.

4. The City thus requests an extension of time to March 28, 2023.

5. This extension of time is not being brought for purposes of undue delay, will not cause any party prejudice, and will allow for a full and fair determination of the issues of this case.

6. The City's counsel conferred with Plaintiff's counsel who agrees to this extension.

WHEREFORE, the City respectfully requests that the Court enter an order extending the deadline to respond to Plaintiff, Theresa Kennedy's Motion for Leave to Add Plaintiffs and to File Amendment to Amended Complaint from March 14, 2023 to March 28, 2023, and granting any other and further relief that this Court deems equitable and just.

Dated: March 10, 2023

Respectfully submitted,

CITY OF CHICAGO

/s/ Adam W. Decker

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