

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

Theresa Kennedy, Santiago Bravo, and John Plummer, individually and for others similarly situated,

Plaintiffs,

v.

City of Chicago,

Defendant.

Case No. 20-cv-1440

Hon. Thomas M. Durkin

AGREED MOTION TO RESET BRIEFING SCHEDULE

Plaintiffs Theresa Kennedy, Santiago Bravo, and John Plummer, and Defendant the City of Chicago (collectively, “Parties”), by and through their respective undersigned counsel, request that the Court reset the briefing schedule for the City’s Motion for Judgment on the Pleadings Pursuant to Federal Rule of Civil Procedure 12(c) (Dkt. 168), and the City’s Motion to Stay Discovery and Class Certification Proceedings. (Dkt. 169) as follows:

1. Plaintiffs’ responses in opposition to the City’s Motion for Judgment on the Pleadings Pursuant to Rule 12(c) and the Motion to Stay Discovery and Class Certification Proceedings to be filed by Wednesday, December 13, 2023; and
2. The City’s replies in support of the Motion for Judgment on the Pleadings Pursuant to Rule 12(c) and the Motion to Stay Discovery and Class Certification Proceedings to be filed by Wednesday, January 3, 2024.

WHEREFORE, the Parties respectfully request that the Court reset the agreed briefing schedule set forth herein.

[signatures on next page]

Dated: December 7, 2023

Respectfully submitted,

CITY OF CHICAGO

/s/ Kenneth N. Flaxman

Counsel for Plaintiff

Kenneth N. Flaxman

knf@kenlaw.com

Joel A. Flaxman

jaf@kenlaw.com

Kenneth N. Flaxman, P.C.

200 S. Michigan Avenue, Ste. 201

Chicago, Illinois 60604

(312) 427-3200

/s/ Adam W. Decker (with consent)

***Special Assistant Corporation Counsel
for Defendant***

Allan T. Slagel aslagel@taftlaw.com

Elizabeth E. Babbitt ebabbitt@taftlaw.com

Adam W. Decker adecker@taftlaw.com

Elizabeth A. Winkowski

ewinkowski@taftlaw.com

TAFT STETTINIUS & HOLLISTER LLP

111 E. Wacker Drive, Ste. 2800

Chicago, Illinois 60601

(312) 527-4000

***Assistant Corporation Counsel for
Defendant***

Raoul Mowatt

raoul.mowatt@cityofchicago.org

City of Chicago Department of Law

2 N. LaSalle Street, Ste. 420

Chicago, Illinois 60602

(312) 744-3283