

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

ELGIN JORDAN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 20-cv-04012
)	
CITY OF CHICAGO; BRYAN COX, PETER)	Honorable Joan B. Gottschall
THEODORE, DAVID SALGADO, and ROCCO)	
PRUGER,)	
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO FILE REPLY IN SUPPORT OF ITS MOTION TO DISMISS**

NOW COMES Defendant City of Chicago (“City”), through its counsel, Mark A. Flessner, Corporation Counsel, through his Special Assistants, Nathan & Kamionski LLP, respectfully seeks a 14-day extension of time to file its reply in support of its motion to dismiss to October 30, 2020. In support of this motion, Defendant City states as follows:

1. On September 11, 2020, Defendant City filed its motion to dismiss Plaintiff’s Complaint.
2. On September 14, 2020, this Court set the following briefing schedule: Plaintiff’s response due October 2, 2020; Defendant City’s reply due October 16, 2020.
3. While counsel for the City is drafting a reply, scheduling issues in other matters, complicated by the public health emergency, have hindered progress. Also, personal responsibilities have impacted counsel for the City’s ability to fully respond to Plaintiff’s response within the set schedule.

4. Therefore, Defendant City requests an extension to file its reply to October 30, 2020. There will only be one reply brief filed, however to the extent necessary, undersigned counsel requests this extension apply to all Defendants.

5. Undersigned counsel has discussed this extension with Plaintiff's counsel. Plaintiff's counsel does not oppose this motion.

6. This is Defendant City's first motion for an extension of time of this briefing schedule. This motion is not brought for the purposes of delay and good cause exists to grant this brief extension.

Defendant City respectfully requests that this Court grant additional time, until October 30, 2020, to file its reply in support of its motion to dismiss.

Respectfully submitted,

MARK A. FLESSNER
Corporation Counsel of the City of Chicago

/s/ Grzegorz Labuz
Special Assistant Corporation Counsel

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CERTIFICATE OF SERVICE

I, Grzegorz Labuz, an attorney, hereby certify that on October 12, 2020, I electronically filed the above and foregoing document with the Clerk of the Court using the *CM/ECF* system, which sent electronic notification of the filing on the same day to all counsel of record.

/s/ Grzegorz Labuz
Grzegorz Labuz