

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

JEANA K. REINBOLD, solely as the )  
Chapter 7 Trustee of the Bankruptcy )  
Estate of CHAUNCEY RAMON CARNES, )  
Plaintiff, )  
vs ) No. 1:20-cv-06214  
CITY OF CHICAGO and CHICAGO ) Judge: Franklin U. Valderrama  
POLICE OFFICERS, DELGADO #4780 )  
and SWANK #11337, ) Magistrate: Sunil R. Harjani  
Defendants. )

**NOTICE OF AGREED MOTION**

**TO:** Kenneth N. Flaxman  
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**PLEASE TAKE NOTICE** that on **December 2, 2020**, at **9:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned shall appear before the **Honorable Judge Franklin U. Valderrama** or any Judge sitting in his stead, in **Room 1219**, 219 South Dearborn, Chicago, Illinois and move the Court pursuant to the attached: **AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT**

By: /s/ Eileen M. Letts  
Attorney Eileen M. Letts  
/s/ Peter F. Heraty  
Attorney Peter F. Heraty  
Special Assistant Corporation Counsel  
ZUBER LAWLER & DEL DUCA LLP  
135 S. LaSalle Street Suite 4250  
Chicago, IL 60603  
Attorneys for Defendants  
Officer Swank and Officer Delgado

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing **AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD IN RESPONSE TO PLAINTIFF'S COMPLAINT** to be served via electronic notification, upon the person named below, on this 25<sup>th</sup> day of November 2020.

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/s/ Peter F. Heraty  
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