

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

Jeana K. Reinbold, solely as Chapter 7)	
Trustee of the Bankruptcy Estate of)	Case No. 20 C 6214
Chauncey Ramon Carnes,)	
)	Judge Franklin Valderrama
Plaintiff,)	
)	Magistrate Sunil Harjani
v.)	
)	
City of Chicago and Chicago Police)	
Officers Delgado #4780 and Swank #11337,)	
)	
Defendants.)	

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

Defendants Delgado and Swank (collectively "Defendant Officers"), by and through their attorney, Eileen M. Letts, Special Assistant Corporation Counsel, and Defendant City of Chicago, by and through its counsel, Celia Meza, Acting Corporation Counsel for the City of Chicago, respectfully request that this Court extend the time for all defendants to answer or otherwise plead to Plaintiff's Amended Complaint up to and including June 1, 2021. In support of this motion, the Defendants states as follows:

1. Plaintiff Jeana Reinbold, as Chapter 7 Trustee of the Bankruptcy Estate of Chauncey Carnes, filed suit on October 20, 2020 alleging constitutional violations arising out of the February 2, 2020 traffic stop and detention of Chauncey Carnes. ECF Dkt. No. 1.
2. Thereafter, all defendants filed responsive pleadings to Plaintiff's complaint. ECF Dkt No. 14, 15.

3. Thereafter Plaintiff filed her First Amended Complaint (“FAC”) on May 4, 2021. ECF Dkt. No. 26. In the FAC, Plaintiff added factual allegations and a *Monell* claim alleging deficient City policies for the first time. *Id.*

4. In order to properly prepare a response pleading, undersigned counsel needs additional time to obtain and review relevant records, investigate the facts underlying Plaintiff’s Complaint, and evaluate the allegations in Plaintiff’s FAC.

5. The undersigned counsel emailed Plaintiff’s counsel, Ken Flaxman, on May 17, 2021, regarding this motion for extension, and Plaintiff responded that she had no objection to the relief sought in this motion.

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

WHEREFORE, the undersigned counsels respectfully request that this Court grant the Defendant Officers and Defendant City of Chicago an extension of time up to and including June 1, 2021, to file their respective answers or otherwise plead to Plaintiff’s Complaint and for any further relief this Court deems appropriate and just.

Dated: May 18, 2021

Respectfully submitted,

CELIA MEZA
Acting Corporation Counsel of the City of Chicago

BY: /s/Cheryl L. Friedman
Cheryl L. Friedman
Assistant Corporation Counsel
On behalf of Defendant City of Chicago

Marion Moore, Chief Assistant Corporation Counsel
Cheryl Friedman, Assistant Corporation Counsel
City of Chicago, Department of Law
Federal Civil Rights Litigation Division
2 N. LaSalle Street, Suite 420
Chicago, Illinois 60602
(312) 744-4038

Respectfully submitted,

BY: /s/Eileen M. Letts

Eileen M. Letts

Special Assistant Corporation Counsel

On behalf of Defendant Officers

Peter Heraty, Special Assistant Corporation Counsel

Zuber Lawler, LLP

135 S. LaSalle Street, Suite 4250

Chicago, Illinois 60603

(312) 346-1100

CERTIFICATE OF SERVICE

I hereby certify that on May 18, 2021, I served a true and correct copy of the foregoing **DEFENDANTS' JOINT UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT** upon Plaintiff, via his attorneys of record, using the CM / ECF system which causes a true and correct copy of the filed documents to be electronically delivered to all electronically registered parties of record.

Respectfully Submitted,

By: /s/Cheryl L. Friedman
Cheryl L. Friedman
Assistant Corporation Counsel