

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

LAMONT TRENT,)	
)	20 C 6217
)	
)	
Plaintiff,)	
v.)	Judge Kocoras
)	
CITY OF CHICAGO, ET AL.,)	
)	Jury Demanded
Defendants.)	

**DEFENDANTS’ SECOND UNOPPOSED MOTION TO EXTEND TIME TO ANSWER
OR OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

Defendants Ryan Galiardo and Khaled Hasan, (“Defendant Officers”), by and through one of its attorneys, Emily R. Bammel, Assistant Corporation Counsel, respectfully request that this Honorable Court extend the time in which all Defendants may answer or otherwise plead to Plaintiff’s complaint up to and including January 19 2021, stating as follows:

1. Defendant City was served approximately October 25, 2020.
2. Defendant Ryan Galiardo was served on approximately November 4, 2020.
3. Defendant Khaled Hasan was served on approximately October 31, 2020.
4. The undersigned counsel was recently assigned to this case and filed her appearance for Defendant Officers on November 11, 2020.
5. In order to investigate the content of Plaintiff’s factual allegations, and to form the most appropriate responsive pleading, Defendant Officers request that this Honorable Court extend the time in which all named Defendants may answer or otherwise plead to Plaintiff’s complaint up to and including January 19, 2021.

6. Defendants are awaiting receipt and review of specific videos referenced in Plaintiff's Complaint that pertain to direct allegations, requiring an answer by Defendant Officers.
7. This motion is in no way brought for the purpose of undue delay, but rather to allow Defendant Officers time to prepare the most appropriate responsive pleading in light of the allegations contained in Plaintiff's complaint. No prejudice will result to Plaintiff by the granting of this motion.
8. On December 16, 2020, the undersigned counsel spoke with the Plaintiff's attorney of record via email correspondence regarding our request for an extension of time for an additional 30 days to respond to Plaintiff's complaint. Plaintiff's counsel indicated that he did not oppose the motion.
9. Defendant City filed an initial motion for an extension of time that was unopposed on November 12, 2020.

WHEREFORE, Defendant Officers request that this Court grant its motion for an extension of time to and including January 19, 2021 for all named Defendants to answer or otherwise plead to the complaint.

DATED: December 17, 2020

Respectfully submitted,

/s/ Emily R. Bammel
Assistant Corporation Counsel
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Chicago, Illinois 60602
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CERTIFICATE OF SERVICE

I, Emily Bammel, certify that on December 17, 2020 I served a copy of the foregoing to Plaintiff's attorney of record through the ECF filing system at the address listed below:

Joel Flaxman

200 S. Michigan Ave. Suite 201

Chicago, IL 60604

jaf@kenlaw.com

/s/ Emily R. Bammel

Emily R. Bammel