

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

LAMONT TRENT,)	
Plaintiff,)	Case No. 20-cv-6217
)	
v.)	Honorable Charles P. Kocoras
)	
CITY OF CHICAGO, RYAN GALIARDO)	Magistrate Judge Sunil R. Harjani
And KHALED HASAN,)	
)	Jury Trial Demanded
)	
Defendants.)	

**DEFENDANT CITY OF CHICAGO’S UNOPPOSED
MOTION FOR EXTENSION OF TIME**

Defendant City of Chicago (“the City”), by and through its attorney, Mark A. Flessner, Corporation Counsel for the City of Chicago, respectfully requests that this Court extend the time for it to answer or otherwise plead to Plaintiff’s Complaint to and including December 18, 2020. In support of this unopposed motion, the City states as follows:

1. Plaintiff filed his complaint on October 20, 2020. Dkt. 1.
2. The undersigned filed his appearance on November 12, 2020.
3. In order to properly prepare a responsive pleading, undersigned counsel, as well as potential counsel for the Individual Defendants, will need additional time to obtain and review relevant records, investigate the facts underlying Plaintiff’s Complaint, meet with the individual defendants as agents of the City, and evaluate the allegations in Plaintiff’s Complaint.
4. The City therefore also requests that this extension be granted as to all named Defendants.
5. The undersigned counsel has conferred with Plaintiff’s counsel, who does not oppose this motion.

6. This motion is brought in good faith and is not intended to cause undue delay. No prejudice will result to Plaintiff by the granting of this motion.

WHEREFORE, the City respectfully requests that this Court grant all named Defendants an extension of time to and including December 18, 2020, to file their answer or otherwise plead to Plaintiff's Complaint and for any further relief this Court deems appropriate and just.

Dated: Nov. 12, 2020

Respectfully submitted,

MARK A. FLESSNER
Corporation Counsel for the City of Chicago

By: /s/ Raoul Vertick Mowatt
Raoul Vertick Mowatt
Assistant Corporation Counsel

Raoul Vertick Mowatt, Assistant Corporation Counsel
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Attorneys for the City of Chicago

CERTIFICATE OF SERVICE

I hereby certify that on November 12, 2020, I served the foregoing document upon all counsel of record by filing a copy with the Clerk of the Northern District of Illinois using the Court's electronic filing system.

/s/ Raoul Vertick Mowatt
Raoul Vertick Mowatt
Assistant Corporation Counsel