

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

DOMINIQUE TURNER, individually and as next
friend of her minor children, TJ1, TJ2, TJ3 and
TJ4,

Plaintiff,

v.

CITY OF CHICAGO, DAVID ALVAREZ, JR.,
#16131, BRADLEY ANDERSON, #15660,
SAMUEL ANGEL, #16501, LUCAS BOYLE,
#12059, CORNELIUS BROWN, #2235,
ANTHONY BRUNO, #1123, BRANDON
CAMPBELL, #6278, YVETTE CARRANZA,
#13435, DANIELLE CUSIMANO, #16619,
EMILIO DE LEON, #16360, DERVIS
DEMIROVIC, #15664, DANIELLE DUNN,
#9615, DAMIEN ENOCH, #12694, DOMINIC
FERRO, #17503, VICTOR GUEBARA, #17147,
STEVEN HOLDEN, #8149, ANDREW
KHALIFEH, #9557, CHARLES MCCLAY,
#4735, AARON MCCLELLAND, #9164,
MARCO MENDOZA, #1362, ANTONIO
MIRANDA, #8264, SEAN RYAN, #13198,
HUGO SANCHEZ, #14269, CARLOS
SANTAMARIA, #9919, DIMAR VASQUEZ,
#17910, BRYAN VIELMAN, #18705, CURTIS
WEATHERBY, #7866, SCOTT WESTMAN,
#18472, and RUSSEL WILLINGHAM, #511,

Defendants.

No. 21-cv-00704

**CHICAGO POLICE DEPARTMENT OFFICERS' UNOPPOSED MOTION FOR
ENLARGEMENT OF TIME TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendants Chicago Police Officers ("Officers"), by and through their
attorneys, TRIBLER, ORPETT & MEYER, P.C., and for their Unopposed Motion for an
Enlargement of Time to Answer or Otherwise Plead, state as follows:

1. Plaintiff Dominique Turner, individually, and as next friend of her minor children, TJ1, TJ2, TJ3 and TJ4, filed this Complaint on February 8, 2021 against Defendants City of Chicago and twenty-nine (29) individual Officers.

2. Plaintiff brings this action pursuant to 42 U.S.C. 1983 and 42 U.S.C. 3617, alleging improper searches of her residence on two different occasions.

3. The undersigned counsel has recently been retained to represent each of the twenty-nine Officers and has spoken with the majority of these Officers confirming representation. However, there are a few Officers who have not yet consented to representation.

4. The Officers' answer to the Complaint is currently due to be filed on April 26, 2021.

5. Given the numerous parties involved, counsel for the Officers are requesting an additional 35 days to answer or otherwise respond to Plaintiff's Complaint to allow counsel more time to fully investigate the myriad factual allegations brought against each individual Officer.

6. Counsel has sought Plaintiff's counsel's agreement to the extension, and he does not oppose it.

WHEREFORE, for the reasons stated above, the Defendant Officers respectfully request the Court to enter an order granting an extension up to and including May 31, 2021, to file its Answer or otherwise respond to the Complaint.

Respectfully submitted,

TRIBLER, ORPETT & MEYER, P.C.

s/ William B. Oberts

One of the attorneys for Defendants,
Chicago Police Department Officers

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Chicago Police Department Officers' Motion for Enlargement of Time to Answer or Otherwise Plea was served upon:

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service was accomplished pursuant to ECF as to Filing Users and complies with LR 5.5 as to any party who is not a Filing User or represented by a Filing User by mailing a copy to the above-named attorney or party of record at the address listed above, from 225 W. Washington Street, Suite 2550, Chicago, IL 60606, prior to 5:00 p.m. on the 23rd day of April, with proper postage prepaid.

s/William B. Oberts
an Attorney