

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

Dominique Turner, individually )  
and as next friend of her minor )  
children, TJ1, TJ2, TJ3, and TJ4, )  
) No. 21-cv-704  
*Plaintiff,* )  
) (*Judge Durkin*)  
-v-s- )  
) )  
City of Chicago, et al. )  
) )  
*Defendants.* )

## UNOPPOSED MOTION FOR EXTENSION

Plaintiff, by counsel and without objection by defendants, respectfully requests that the Court extend the deadline to respond to defendants' motions to dismiss by 7 days (to July 9, 2021) and to permit plaintiff to file an amended complaint as the response.

Grounds for this motion are as follows:

1. On June 2, 2021, the Court set the following schedule for briefing defendants' motions to dismiss: "Plaintiff's response is due by 7/2/2021; Defendants' reply is due by 7/27/2021." (ECF No. 21.)
2. Plaintiff requires additional time because of the other professional obligations of counsel.
3. Plaintiff's response to the motions to dismiss will be an amended complaint.

4. Defendants do not oppose this motion.

Accordingly, plaintiff respectfully requests that the Court extend the deadline to respond to defendants' motions to dismiss by 7 days (to July 9, 2021) and permit plaintiff to file an amended complaint as the response.

Respectfully submitted,

/s/ Joel A. Flaxman  
Joel A. Flaxman  
ARDC No. 6292818  
Kenneth N. Flaxman  
200 S Michigan Ave Ste 201  
Chicago, IL 60604-2430  
(312) 427-3200  
*Attorneys for Plaintiff*