

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

DOMINIQUE TURNER, et. al.,	)	
	)	
Plaintiff,	)	Case No. 21 CV 0704
	)	
	)	Judge Thomas M. Durkin
	)	
	)	Magistrate Judge Jeffery Cummings
v.	)	
	)	
CITY OF CHICAGO, et. al.	)	
	)	
	)	
Defendants.	)	

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF’S COMPLAINT**

Defendant, BRANDON CAMPBELL, by and through one of his attorneys, Nicholas J. Perrone, Assistant Corporation Counsel, respectfully request a 45-day extension of time for all named defendants to answer or otherwise plead to Plaintiff’s Complaint pursuant to Rule 6(b)(1)(B) of the Federal Rules of Civil Procedure. In support of this Motion, Defendant states the following:

1. Plaintiff filed her Complaint on February 8, 2021, which names 29 Chicago police officers as defendants.
2. Defendant Brandon Campbell was served on February 19, 2021 making his answer due on March 12, 2021.
3. Not all Defendant officers have been served. Additionally, due to the large number of officers involved, Counsel needs additional time to gain consent for representation, meet with Defendant officers, gather relevant documents, discuss Plaintiff’s Complaint, and file responsive pleadings.

4. Defendant requests a 45-day extension of time from March 12, 2020<sup>1</sup> to file responsive pleadings. The requested extension is not presented for purposes of delay, but to allow the undersigned time to meet with his clients and investigate the underlying facts of this matter.

5. While this motion is brought on behalf of Officer Campbell, counsel respectfully request that the responsive pleading deadline be extended for all named defendants for the sake of efficiency.

6. No prejudice will be suffered by any party as a result of the requested extension. To the contrary, it is hoped the requested extension will help facilitate the litigation.

7. Counsel was able to contact Plaintiff's counsel by email to discuss this request prior to filing, to which Plaintiff's counsel agreed.

WHEREFORE, Defendant, BRANDON CAMPBELL, respectfully requests a 45-day extension of time for all named Defendants to answer or otherwise plead to Plaintiff's Complaint, up to and including April 26, 2021, and for any other relief this Court deems appropriate.

Dated: March 8, 2021

Respectfully submitted,

/s/Nicholas J. Perrone  
Assistant Corporation Counsel

Jennifer Bagby, Chief Assistant Corporation Counsel  
Jessica Griff, Assistant Corporation Counsel Supervisor  
Nathan Shine, Assistant Corporation Counsel  
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**CERTIFICATE OF SERVICE**

I hereby certify that on March 8, 2021, I submitted the attached MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD FOR ALL DEFENDANTS with the Clerk for the Northern District of Illinois using the Court's electronic filing system or ECF. As a result, a copy was electronically submitted to all counsel and parties of record.

By: /s/Nicholas J. Perrone  
Nicholas J. Perrone