

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

Joseph Lovera,	)	
	)	
<i>Plaintiff</i>	)	
	)	No. 21-cv-6837
-vs-	)	
	)	(Judge Pacold)
Wexford Health Sources, Inc.,	)	
Dr. Kul Sood, Dr. Marlene Henze,	)	(Magistrate Judge Fuentes)
and Dr. Kurt Osmundson,	)	
	)	
<i>Defendants.</i>	)	

**AGREED MOTION TO EXTEND TIME TO FILE**

Plaintiff, with the agreement of defendant, moves the Court to extend for 21 days the time in which the parties may submit a joint written status report (or another appropriate motion). The parties also jointly request that the Court suspend the time for defendants to file their answer until the status of the plaintiff is resolved.

Grounds for this motion are as follows:

1. Promptly upon receipt of the district court's order of March 15, 2024, plaintiff's undersigned counsel sought to communicate with plaintiff.

2. Counsel suspects that plaintiff's failure to respond means that plaintiff is the Joseph Lovera whose obituary was reported on August 7, 2023.

<https://www.legacy.com/us/obituaries/name/joseph-lovera-obituary?id=52639477>.

Like the person referred to in the obituary, plaintiff was 54 years of age in 2013.

3. Counsel, with the agreement of defendants, asks the Court to extend for 21 days the time in which the parties may submit a joint written status report or other appropriate motion. Counsel will use this time to verify that plaintiff is no longer alive and to consult with his next of kin about continuing this lawsuit. The parties jointly request that the Court suspend the time for defendants to file their answer until the status of the plaintiff is resolved

Respectfully submitted,

/s/ Kenneth N. Flaxman  
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Agreed to:

/s/ Robert Tengesdal (with consent)  
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