

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

|                                 |   |                          |
|---------------------------------|---|--------------------------|
| DENNIS JACKSON,                 | ) |                          |
|                                 | ) |                          |
|                                 | ) | No. 22-cv-4337           |
|                                 | ) |                          |
| v.                              | ) | District Judge Alonso    |
|                                 | ) |                          |
| CITY OF CHICAGO, <i>et. al.</i> | ) | Magistrate Judge Weisman |
|                                 | ) |                          |
|                                 | ) |                          |
|                                 | ) |                          |
| Defendants.                     | ) |                          |

**JOINT MOTION**  
**FOR EXTENSION OF TIME TO COMPLETE FACT DISCOVERY**

Plaintiff, by and through his attorney, Joel Flaxman, and Defendants, by and through one of their attorneys, Alexander Michelini, Assistant Corporation Counsel, respectfully move this Honorable Court for an extension of time to complete fact discovery, up to and including December 22, 2023, and in support thereof, state as follows:

1. On May 31, 2023, this Court adopted the parties suggested fact discovery closure date and ordered fact discovery closed on November 14, 2023. Dkt. 36
2. The parties have been diligently working to complete remaining depositions in this matter. As of the date of this filing, all parties have been deposed with the exception of Defendants Foertsch and Evans. The parties are in the process of scheduling these remaining Defendants' depositions.
3. In addition, third-party witness Bianca Spencer has been served and was scheduled to be deposed on November 14, 2023, but informed the parties she was unable to appear after her dep was set to begin. The parties are in the process of rescheduling Ms. Spencer's deposition.

4. Furthermore, counsel for Defendants have attempted to serve third-party witness Louise Price. Undersigned counsel has received an affidavit of non-service from process servers for an attempted date of service on November 9, 2023. Counsel for Defendants need additional time to locate and serve Ms. Price for her deposition.
5. The parties need additional time to conduct the remaining fact discovery depositions.
6. An extension through December 22, 2023, would not prejudice either party and is done so in good faith.

WHEREFORE, the parties respectfully request that this Court grant the parties an extension of time to complete fact discovery through December 22, 2023, and for such further relief the Court deems just and proper.

Dated: November 14, 2023

Respectfully submitted,

/s/ Joel A. Flaxman

Joel A. Flaxman

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***Attorneys for Defendants***

**CERTIFICATE OF SERVICE**

I, hereby certify that I have served a copy of **JOINT MOTION FOR EXTENSION OF TIME TO COMPLETE FACT DISCOVERY** upon all counsel of record using the District Court's Electronic Filing System on this 14<sup>th</sup> day of November 2023.

/s/ AlexanderMichelini

Assistant Corporation Counsel