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

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Dennis Jackson,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:22-cv-04337
	)	
City of Chicago, Patrick Boyle, Jennifer Burmistrz,	)	Honorable Jorge L. Alonso
Efrain Carreno, Matthew Evans, John Foertsch,	)	
Edward Garcia, Michael Higgins, Gerald Lau, and	)	Honorable M. David Weisman
Jeffrey Lawson,	)	
	)	
Defendants.	)	

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**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO  
FILE AMENDED MOTION FOR SUMMARY JUDGMENT**

Defendants' City of Chicago, Patrick Boyle, Jennifer Burmistrz, Efrain Carreno, Matthew Evans, John Foertsch, Edward Garcia, Michael Higgins, Gerald Lau, and Jeffrey Lawson, by and through one of their attorneys, Michael J. Dinard, respectfully requests leave to file an Amended Motion for Summary Judgment and an Amended Memorandum in Support of said motion. In support of this unopposed motion, defendants state as follows:

1. On March 25, 2024, defendants City of Chicago, Patrick Boyle, Jennifer Burmistrz, Efrain Carreno, Matthew Evans, John Foertsch, Edward Garcia, Michael Higgins, Gerald Lau, and Jeffrey Lawson filed their motion for summary judgment, Rule 56.1 statement of facts, as well as a memorandum in support of said motion. (Dkt. 65-67.)
2. On that same day defendants also filed an opposed motion for leave to file an amended answer to plaintiff's complaint. (Dkt. 64.)

3. On March 26, 2024 defense counsel and plaintiff's counsel were able to confer regarding the motions filed on March 25, 2024.

4. In these deliberations defense counsel agreed to withdraw their motion for leave to file an amended answer. The parties also agreed to allow defendants to file an amended motion for summary judgment based on these conversations.

5. Defendants have attached their amended motion for summary judgment as Exhibit 1, and their amended memorandum in support as Exhibit 2.

6. Parties have also agreed, if the Court allows, to add one week to the remaining briefing deadlines. The parties ask that plaintiff's response be due on April 29, 2024, and defendant's reply be due on May 13, 2024.

**WHEREFORE**, defendants respectfully request that this Court allow them leave to file an amended motion for summary judgment, an amended memorandum in support of said motion, as well as grant an extension of one week for the remaining deadlines, April 29, 2024 for plaintiff's response to defendants' amended motion for summary judgment, and May 13, 2024 for defendants' reply in support of their motion for summary judgment, and any other relief this Court finds reasonable and just.

Dated: April 8, 2024

Respectfully submitted,

/s/ Michael J. Dinard  
MICHAEL J. DINARD  
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***Attorney for defendants***

**CERTIFICATE OF SERVICE**

I hereby certify that, on **April 8, 2024**, I submitted with the Clerk for the Northern District of Illinois using the Court's electronic filing system or CM/ECF **Defendants' Unopposed Motion for Leave to File and Amended Motion for Summary Judgment**, and thereby provided a copy of same by service to all attorneys of record at the electronic addresses they provided to the court.

/s/ Michael J. Dinard  
MICHAEL J. DINARD  
Assistant Corporation Counsel