

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

David Walker,)
)
 Plaintiff,)
)
) Case No. 22 CV 5348
)
 -vs-)
) Honorable Lindsay C. Jenkins
)
 City of Chicago, Phillip Cline, Debra Kirby,) Magistrate Judge Shelia M. Finnegan
 Ronald Watts, Brian Bolton, Alvin Jones,)
 Manuel Leano, Lamonica Lewis, Kallatt) (This case is part of *In re: Watts*
 Mohammed, Douglas Nichols Jr., Elsworth) *Coordinated Pretrial Proceedings*,
 Smith Jr.) Master Docket No. 19-cv-1717)
 Defendants.)
)
)

**DEFENDANT OFFICERS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER PLAINTIFF'S COMPLAINT**

Defendants, Brian Bolton, Alvin Jones, Manuel Leano, Lamonica Lewis, Douglas Nichols Jr., and Elsworth Smith Jr (collectively “Defendant Officers”) by and through their undersigned counsel, Hale & Monico LLC, hereby submit the following Unopposed Motion for Extension of Time to Answer Plaintiff’s Complaint as follows:

1. Defendant Officers’ Answer to Plaintiff’s Complaint is due September 6, 2024. Dkt. 45.
2. This case is part of the *Watts Coordinated Pretrial Proceedings*, 19-cv-1711, which consists of nearly 200 pending lawsuits.
3. The undersigned counsel have been diligently trying to answer said Complaint, however, they are in need of additional time in which to do so.

4. On September 5, 2024, the undersigned counsel completed and filed a lengthy motion for summary judgment in the *Coordinated Proceedings* case of *Ben Baker and Clarissa Glenn v. City of Chicago*, 16-cv-8940.
5. The undersigned counsel have also been actively engaged in expert discovery in other *Coordinated Proceedings* cases like *Leonard Gipson v. City of Chicago et al.*, 18-cv-5120, and *William Carter v. City of Chicago, et al.*, 17-cv-7241; in addition to handling numerous other non-*Coordinated Proceedings* cases.
6. Defendant Officers respectfully request an additional seven (7) days, until September 13, 2024, in which to Answer Plaintiff's Complaint.
7. The undersigned counsel have conferred with Plaintiff's counsel, and Plaintiff's counsel have indicated they do not oppose the granting of this motion.

WHEREFORE, Defendant Officers respectfully request that this Honorable Court enter an Order granting them an additional seven (7) days, until September 13, 2024, to Answer Plaintiff's Complaint.

Respectfully submitted,

/s/ Jason Marx

Special Assistant Corporation Counsel
One of the attorneys for *Defendant Officers*

Andrew M. Hale
William E. Bazarek
Anthony E. Zecchin
Kelly M. Olivier
Jason M. Marx
Hannah Beswick-Hale
HALE & MONICO LLC
53 W. Jackson Blvd., Suite 334
Chicago, IL 60604
Phone (312) 341-9656

CERTIFICATE OF SERVICE

I, Jason Marx, hereby certify that on September 6, 2024, I electronically files the forgoing, DEFENDANT OFFICERS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER PLAINTIFF'S COMPLAINT with the Clerk of the Court using the ECF system, which simultaneously served copies on all counsel of record via electronic notification.

/s/ Jason Marx