

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEAN McCLENDON

Plaintiff,

v.

CITY OF CHICAGO, et al.,

Defendants,

Hon. Sharon Coleman

Mag. Judge Maria Valdez

No. 1:22-cv-05472

DEFENDANTS' UNOPPOSED MOTION TO EXTEND FACT DISCOVERY

Per Judge Coleman's February 24, 2023, order, fact discovery is set to close on October 25, 2023. (*See* dkt. 27.) In referring this matter to the Court, Judge Coleman expressly gave the Court authority to adjust discovery deadlines. (*Id.*)

Defendants now ask that the Court extend fact discovery until November 30, 2023. The City's counsel was set to go to trial in mid-October, and although that matter has settled, pre-trial preparation took a meaningful amount of time away from counsel's other matters, including this case. Additionally, summary judgment briefs are due on October 20th in a complicated reverse conviction case that the City's counsel is defending against, which will require substantial work throughout the end of September and into October.

Similarly, the Officer Defendants' counsel has a trial scheduled in October, which is still proceeding, along with multiple summary judgment briefs due that month.

Finally, a large amount of time was spent attempting to obtain documents from the Illinois Department of Corrections that were originally due per subpoena in May 2023, which slowed

down other discovery that would have proceeded from those documents.¹ (Nevertheless, the parties have been diligently using the time granted them; however, some additional time is needed to complete outstanding discovery.)

This is the first discovery extension sought in this case, and the short extension will not prejudice any party or materially delay resolution of this case. Plaintiff also has no objection to this short extension.

WHEREFORE, the Defendants respectfully ask that the Court extend fact discovery until November 30, 2023.

Respectfully submitted,

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¹ Through meet and confer efforts with IDOC, it seems the requested documents have now been obtained as of September 18th. However, the City reserves its right to seek relief from the Court if needed.