

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

JOHN MARTINEZ,	)	
	)	No. 23 C 1741
<i>Plaintiff,</i>	)	
	)	Hon. Georgia N. Alexakis,
<i>v.</i>	)	District Judge
	)	
REYNALDO GUEVARA, <i>et al.</i> ,	)	Hon. Laura K. McNally,
	)	Magistrate Judge
<i>Defendants.</i>	)	
	)	<b>JURY TRIAL DEMANDED</b>
	)	
	)	
THOMAS KELLY,	)	No. 24 C 5354
	)	
<i>Plaintiff,</i>	)	Hon. Georgia N. Alexakis,
	)	District Judge
<i>v.</i>	)	
REYNALDO GUEVARA, <i>et al.</i> ,	)	Hon. Laura K. McNally,
	)	Magistrate Judge
<i>Defendants.</i>	)	
	)	<b>JURY TRIAL DEMANDED</b>

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE EXPERT DISCLOSURES**

Plaintiffs John Martinez, Thomas Kelly, and Jose Tinajero through their counsel, respectfully request that this Court extend the deadline for the filing of Affirmative Expert Disclosures, up to and including November 26, 2025. In support of this request, Plaintiffs state:

1. On August 20, 2025 Plaintiffs filed an Unopposed Motion to Reset Expert Discovery Schedule and proposed that the court reschedule all affirmative expert reports, both Monell and non-Monell, to November 21, 2025 (Dkt. 275).
2. The Court adopted this schedule (Dkt. 276).
3. While Plaintiffs have been working diligently to organize the upcoming expert disclosures, a retained expert was recently alerted to a change in his testimony schedule for another unrelated case, and will be unable to complete the report by November 21<sup>st</sup>.
4. As a result, Plaintiff respectfully requests that the Court grant an extension for all parties, resulting in the following schedule:

- a) All Party Affirmative Expert Disclosures: November 26, 2025
- b) All Party Rebuttal Expert Disclosures: January 21, 2025

5. No party is likely to be unfairly prejudiced by the Court granting this Motion for an extension until November 26, 2025. The undersigned counsel for Plaintiff contacted counsel for all Defendants, who indicated that they do not oppose this motion.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order amending the expert discovery schedule to provide that Affirmative Expert Disclosures are due on November 26, 2025 and Rebuttal Expert Disclosures are due January 21, 2025.

RESPECTFULLY SUBMITTED,

/s/ Sean Starr  
*Counsel for Plaintiffs*  
*Martinez and Tinajero*

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