

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

| | | |
|------------------------------------|---|-------------------------------|
| VONDELL WILBOURN, individually |) | |
| and for others similarly situated, |) | |
| |) | |
| <i>Plaintiff,</i> |) | |
| |) | Case No. 23-cv-1782 |
| -vs- |) | |
| SHERIFF OF COOK COUNTY and |) | Honorable Manish S. Shah |
| COOK COUNTY, ILLINOIS, |) | Magistrate Judge Young B. Kim |
| |) | |
| <i>Defendants.</i> |) | |

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION
OF TIME TO FILE RESPONSIVE PLEADING**

Defendants, SHERIFF OF COOK COUNTY and COOK COUNTY, ILLINOIS, by and through their attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through her Special Assistant State's Attorneys, JOHNSON & BELL, LTD., respectfully request that this Honorable Court grant Defendants a ten-day extension of time to answer or otherwise plead to Plaintiff's complaint. Grounds for this motion are as follows:

1. Plaintiff filed his complaint on March 22, 2023. [Dkt. 1.]
2. Defendant Sheriff of Cook County waived service, which made its responsive pleading due by May 22, 2023. [Dkt. 6.]
3. On April 14, 2023, the Court granted Cook County's motion for extension of time to respond to Plaintiff's complaint and ordered that both Defendants have until May 22, 2023, to respond to Plaintiff's complaint. [Dkt. 12.]
4. Defendants have been working on a motion to dismiss. However, Defendants require additional time to finalize their arguments in support of a motion to dismiss and ask for a ten-day extension of time to respond to Plaintiff's complaint.

5. On May 18, 2023, Defendants reached out to Plaintiff's counsel to see if they would be agreeable to a short extension of time for Defendants to file a responsive pleading. Plaintiff's counsel informed defense counsel that they have no objection to Defendants' request for a ten-day extension of time.

6. Defendants' request for an extension of time is not made for the purpose of delay or for any other improper purpose but to allow Defendants' adequate time to prepare a responsive pleading.

WHEREFORE, Defendants Sheriff of Cook County and Cook County, Illinois respectfully request that this Honorable Court enter an order granting them a ten-day extension of time up to and including June 1, 2023, to respond to Plaintiff's complaint.

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

Dated: May 18, 2023

/s/ *Samuel D. Branum*
Special Assistant State's Attorney

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