

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

Vondell Wilbourn, individually and)
for others similarly situated,)
)
)
 Plaintiffs,)
)
) No. 23-cv-1782
-vs-)
)
Sheriff of Cook County and Cook) *(Judge Shah)*
County, Illinois,)
)
)
 Defendants.)

**PLAINTIFF'S AGREED MOTION TO RESET BRIEFING
SCHEDULE BY ONE WEEK**

Plaintiff, with the consent of defendants, moves the Court to reset the briefing schedule on plaintiff's impending motion for class certification by 7 days.

Grounds for this motion are as follows:

1. Pursuant to the Court's order of March 3, 2025, plaintiff's motion for class certification is due May 15, 2025, defendant's response is due June 5, 2025, and plaintiff's reply is due June 12, 2025.
2. Plaintiff respectfully requests an additional 7 days to file the motion for class certification, with commensurate extensions of the other dates in the schedule. Undersigned counsel requests the additional time because counsel has been functioning at reduced efficiency from a month-long cough which, after a belated visit to a physician, now seems to be under control.
3. Counsel has shared this motion with defense counsel who agrees to the requested readjustment of the schedule.

WHEREFORE plaintiff requests that the Court reset the briefing schedule on plaintiff's impending motion for class certification as follows: plaintiff's motion for class certification to be due on May 22, 2025, defendant's response to be due on June 12, 2025, and plaintiff's reply due on June 19, 2025.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
ARDC No. 08830399
Joel A. Flaxman
200 South Michigan Ave Ste 201
Chicago, Illinois 60604
(312) 427-3200
Attorneys for Plaintiffs