

**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-)	
)	Honorable Manish S. Shah
SHERIFF OF COOK COUNTY and)	Magistrate Judge Young B. Kim
COOK COUNTY, ILLINOIS,)	
)	
<i>Defendants.</i>)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S MOTION FOR CLASS CERTIFICATION**

Defendants, SHERIFF OF COOK COUNTY and COOK COUNTY, ILLINOIS, by their attorney, EILEEN O'NEILL BURKE, 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 one-week extension of time to respond to Plaintiff's motion for class certification. Grounds for this motion are as follows:

1. Pursuant to the Court's order of March 3, 2025, Plaintiff's motion for class certification was due May 15, 2025. (Minute Entry, ECF No. 50.)
2. On May 13, 2025, the Court granted Plaintiff's request, which was agreed to by Defendants, to extend the deadline to file his motion for class certification by one week. (Mot., ECF No. 54; Minute Entry, ECF No. 56.) Defendants' response is currently due June 12, 2025, and Plaintiff's reply is due June 19, 2025. (Minute Entry, ECF No. 56.)
3. On May 22, 2025, Plaintiff timely filed his motion for class certification. (Mot., ECF No. 57.)

4. Defendants have been working on a response to Plaintiff's motion but do not anticipate being able to finalize the response by the current deadline of this Thursday. Defense counsel also needs to provide a draft of the response to its clients with sufficient time to review the response prior to filing.

5. Defendants respectfully request a one-week extension of time to respond to Plaintiff's motion. Because the requested new deadline falls on June 19, 2025, which is a federal holiday, Defendants respectfully request until June 20, 2025, to file a response. Defendants request that the deadline for Plaintiff to file his reply also be extended by one week, or until June 27, 2025.

6. This is Defendant's first request to extend the deadline to file a response. This motion is not brought for the purpose of delay but rather to provide additional time and opportunity to prepare and finalize a response.

7. Plaintiff does not object to Defendants' request for an extension of time.

WHEREFORE, Defendants Sheriff of Cook County and Cook County, Illinois respectfully request that this Honorable Court enter an order granting them a one-week extension of time up to and including June 20, 2025, to respond to Plaintiff's motion for class certification.

Respectfully submitted,

EILEEN O'NEILL BURKE
State's Attorney of Cook County

Dated: June 9, 2025

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

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