

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

**NOTICE OF MOTION**

To:     Joel A. Flaxman  
          Kenneth N. Flaxman  
          Kenneth N. Flaxman, P.C.  
          200 South Michigan Avenue, STE 201  
          Chicago, IL 60604-6107  
          Email: [jaf@kenlaw.com](mailto:jaf@kenlaw.com)  
          Email: [knf@kenlaw.com](mailto:knf@kenlaw.com)

**PLEASE TAKE NOTICE** that on **Tuesday, June 17, 2025, at 9:45 a.m.**, the undersigned attorney will appear before the Honorable Judge Manish S. Shah at the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, Courtroom 1919 and present Defendants' Unopposed Motion for Extension of Time 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

Monica Burkoth ([burkothm@jbltd.com](mailto:burkothm@jbltd.com))  
Samuel D. Branum ([branums@jbltd.com](mailto:branums@jbltd.com))  
JOHNSON & BELL, LTD.  
33 W. Monroe, Ste. 2700  
Chicago, Illinois 60603  
(312) 372-0770