

**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 LEAVE TO FILE INSTANTER
THEIR RESPONSE TO PLAINTIFF'S MOTION FOR CLASS
CERTIFICATION IN EXCESS OF FIFTEEN PAGES**

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., and pursuant to Local Rule 7.1, state as follows:

1. On March 22, 2025, Plaintiff filed a motion for class certification, addressing the multiple requirements found in Rule 23, including numerosity, commonality, typicality, adequacy, predominance, and superiority.
2. Due to the multiple Rule 23 requirements Defendants must address, Defendants respectfully request they be allowed more than fifteen pages to adequately respond to Plaintiff's motion for class certification.
3. Defendants' response is nineteen pages, excluding the table of contents, table of cases, and signature page.

4. If the Court denies Defendants' motion, Defendants respectfully request leave to file an abbreviated version.

5. Plaintiff's counsel advised Defendants' counsel that he does not oppose this motion, but he has requested an additional week to submit a reply brief.

WHEREFORE, Defendants respectfully request that this Court enter an order granting Defendants leave to file their response to Plaintiff's motion for class certification in excess of the fifteen-page limitation *instanter* and to allow Plaintiff an additional week, until July 10, 2025, to file a reply brief.

Respectfully submitted,

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

Dated: June 20, 2025

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

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