

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

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

NOTICE OF MOTION

To: Joel A. Flaxman
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PLEASE TAKE NOTICE that on Thursday, June 26, 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 Leave to File *Instanter* Their Response to Plaintiff's Motion for Class Certification in Excess of Fifteen Pages.

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

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