

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

MADELINE MENDOZA,)	
)	
<i>Plaintiff,</i>)	
)	No. 23-cv-2441
-vs-)	
)	<i>(Judge Durkin)</i>
REYNALDO GUEVARA, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	
)	
MARILYN MULERO,)	
)	
<i>Plaintiff,</i>)	
)	No. 23-cv-4795
-vs-)	
)	<i>(Judge Durkin)</i>
REYNALDO GUEVARA, <i>et al.</i> ,)	
)	
<i>Defendants.</i>)	

**DEFENDANTS' UNOPPOSED MOTION FOR LIMITED EXTENSION OF TIME
TO COMPLETE THE DEPOSITION OF FORMER ASSISTANT STATE'S
ATTORNEY MICHAEL KREJCI**

NOW COME Defendants, by and through their attorneys and move this Honorable Court for an extension of time to complete the deposition of former Assistant State's Attorney (ASA) Michael Krejci. In support of its motion, Defendants state as follows:

1. After conferring with Counsel for former ASA Michael Krejci, Defendants respectfully request additional time to complete the deposition of Mr. Krejci pursuant to Defendants' amended deposition subpoena and this Court's April 25, 2025, order, and request that the deadline be extended up to and including June 27, 2025. Defendants have diligently attempted to schedule and proceed with this deposition over the past several months. However, due to

circumstances outside of Defendants' control, counsel for Mr. Krejci has informed Defendants that they are unable to produce Mr. Krejci for his deposition by the current deadline of May 16, 2025, and have requested additional time to do so.

2. On January 31, 2025, Defendants issued a subpoena for Mr. Krejci's deposition, which was noticed to proceed on February 14, 2025.
3. Pursuant to the policy of the Cook County State's Attorney's Office ("CCSAO"), Defendants diligently corresponded with the CCSAO to determine whether they would accept service on behalf of Mr. Krejci.
4. Despite these efforts, Defendants were unable to confirm Mr. Krejci's appearance for the scheduled deposition, and as a such, the deposition did not proceed on February 14, 2025.
5. On February 24, 2025, ten days after the deposition was originally scheduled, the CCSAO advised Defendants that they would contact Mr. Krejci and would inform Defendants whether they could accept service on his behalf.
6. The following day, on February 25, 2025, Defendants filed a motion for limited extension of time to complete certain depositions, including the outstanding deposition of Mr. Krejci, among other matters. *See* Dckt. No. 103.
7. On March 3, 2025, this Court entered an order entering and continuing Defendants' motion as it pertained to Mr. Krejci's deposition.
8. On April 8, 2025, this Court entered an order granting Defendants leave to conduct Mr. Krejci's deposition. *See* Dckt. No. 119.
9. The following day, on April 9, Defendants' counsel sent a copy of this court's order to Assistant State's Attorney Jessica Scheller, Chief of the Civil Actions Bureau of the Cook County State's Attorney's Office and Assistant State's Attorney David A. Adelman, Supervisor – Specialized Discovery Section of the Civil Actions Bureau of the Cook County State's

Attorney's Office and requested a time to discuss next steps for scheduling Mr. Krejci's deposition.

10. On April 10, 2025, Defendants were advised that outside counsel – not the CCSAO – would be representing Mr. Krejci for purposes of his deposition.
11. On April 10, 2025, Defendants informed counsel for Mr. Krejci of the May 16, 2025, deadline to complete the deposition.
12. On May 5 2025, following a request for Mr. Krejci's availability, Defendants again contacted Mr. Krejci's counsel via email and reiterated the May 16, 2025, deadline to complete the deposition.
13. After receiving no response, Defendants followed up once more on May 6, 2025.
14. Having received no response from counsel for Mr. Krejci, Defendants issued an amended deposition subpoena on May 9 2025, setting his deposition for May 16, 2025, to allow counsel for Mr. Krejci additional time if necessary.
15. On May 12, 2025, counsel for Mr. Krejci informed Defendants that they would not be able to produce Mr. Krejci by the May 16 deadline and are currently coordinating to provide alternate dates in June.
16. Defendants' counsel reached out to Plaintiffs' counsels and asked whether they opposed this request. Plaintiffs' counsel advised that they do not oppose this request for relief.
17. As this Court is aware, *Monell*-based fact discovery is still ongoing, and no deadlines have been set for expert disclosures, dispositive motions, or a trial. Accordingly, no party will be prejudiced by a short extension to complete this limited third-party deposition.
18. Moreover, this deposition involves third-party discovery from a full-time practicing private attorney concerning events that occurred many years ago and relate to three separate, though related, criminal matters.

19. For these reasons, Defendants respectfully request additional time up to and including June 27, 2025, to complete the deposition of Mr. Krejci.

WHEREFORE, Defendants, REYNALDO GUEVARA, THE CITY OF CHICAGO, GERI LYNN YANOW as Special Representative for ERNEST HALVORSEN, deceased, STEPHEN GAWRYS, and ANTHONY RICCIO, respectfully request this Honorable Court grant Defendants' Motion for Extension of Time to Complete the Deposition of Former ASA Michael Krejci and for any other relief as this Court deems just and reasonable.

Respectfully submitted,

By: /s/ Andrea F. Checkai
Andrea F. Checkai
Special Assistant Corporation Counsel

Steven B. Borkan
Timothy P. Scahill
Andrea F. Checkai
Whitney N. Hutchinson
BORKAN & SCAHILL, LTD.
20 South Clark Street, Suite 1700
Chicago, Illinois 60603
(312) 580-1030
Counsel for Reynaldo Guevara

/s/ John Timbo
Special Assistant Corporation Counsel

Josh M. Engquist
John Timbo
Jeffrey R. Kivetz
Kyle T. Christie
Allison L. Romelfanger
Special Assistant Corporation Counsel
THE SOTOS LAW FIRM, P.C.
141 W. Jackson, Suite 1240A
Chicago, Illinois 60604
630-735-3300
Counsel for Individual Defendants

/s/ Catherine Barber
Special Assistant Corporation Counsel

Eileen E. Rosen
Catherine M. Barber
Lauren Ferrise
Rock, Fusco, & Connelly
333 W. Wacker, 19th Floor
Chicago, Illinois 60606
(312) 494-1000
Counsel for Defendant City of Chicago