

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

MADELINE MENDOZA,)	
)	
Plaintiff,)	
)	Case No. 23-cv-2441
v.)	
)	
REYNALDO GUEVARA, et al.,)	
)	
Defendants.)	
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MARILYN MULERO,)	
)	Case No. 23-cv-4795
Plaintiff,)	
)	
v.)	
)	
REYNALDO GUEVARA, et al.,)	
)	
Defendants.)	

**DEFENDANTS’ UNOPPOSED MOTION FOR EXTENSION OF TIME
TO COMPLETE CCSAO 30(B)(6) DISCOVERY**

NOW COME Defendants Reynaldo Guevara, Geri Lynn Yanow, as Special Representative for Ernest Halvorsen, deceased, Anthony Riccio, Stephen Gawrys, and the City of Chicago (collectively “Defendants”), by and through their undersigned counsel, and moving this Court for an extension of time to complete depositions of Cook County State’s Attorney personnel pursuant to Defendant’s Fed. R. Civ. P. 30(b)(6) notice. In support thereof, Defendants state as follows:

1. As this Court is well-aware, Defendants have been diligently attempting to secure certain testimony from the Cook County State's Attorney's Office pursuant to Fed. R. Civ. P. 30(b)(6) since January of this year.
2. The most recent filing by Defendants detailing this procedural history is set forth in Defendants' May 7, 2025 and June 26, 2025, motions for limited extension of time to complete such depositions (which are hereby incorporated by reference). *See* Dckt. Nos. 123, 142.
3. This Court granted these Motions and, most recently, gave the parties until July 31, 2025 to complete the depositions subject to Defendants' notice for which this Court had previously granted leave.
4. The parties have since completed the deposition of one of the responsive deponents, Carol Rogala.
5. Through no fault of Defendants (or Plaintiffs), the parties have not been able to complete the remaining responsive 30(b)(6) discovery on the previous timeline because, among other things, one of the other 30(b)(6) deponents has apparently been unavailable due to other professional commitments.
6. To be clear, again, Defendants do not accuse CCSAO of unreasonable delay or lack of diligence in this regard. To the contrary, CCSAO has been quite responsive and has diligently attempted to secure the required discovery as requested from the most knowledgeable personnel as required under the Federal Rules.
7. However, as this Court is aware, CCSAO has been tasked with identifying, preparing and ultimately producing deponents to testify about matters occurring during a prior administration which has apparently created delays and scheduling issues.

8. After consulting again with CCSAO, Defendants believe that they will be able to complete the remaining Fed. R. Civ. P. 30(b)(6) discovery in the next 30 days.
9. Moreover, as this Court is aware, there remains discovery ongoing on *Monell* issues in this case. Thus, providing some additional time to allow CCSAO to identify, prepare, and present the appropriate deponents will not prejudice any party and will be in the interests of justice.
10. Defendants ask for this Court to extend the deadline to complete this 30(b)(6) discovery to August 30, 2025 and will endeavor to complete the relevant discovery by that deadline. In the event this extended deadline appears to be unrealistic, Defendants will promptly advise the Court.
11. Plaintiffs do not oppose this Motion.

WHEREFORE Defendant prays this Court extend the deadline for completion of Defendants' Fed. R. Civ. P. 30(b)(6) discovery to August 30, 2025 and for whatever other relief this Court deems fit.

Respectfully submitted,

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