

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

MADELINE MENDOZA,	)	
	)	Case No. 23-CV-2441
Plaintiff,	)	
	)	Hon. Thomas M. Durkin
v.	)	
	)	
REYNALDO GUEVARA, et al,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

MARILYN MULERO,	)	
	)	Case No. 23-CV-14795
Plaintiff,	)	
	)	Hon. Thomas M. Durkin
v.	)	
	)	
REYNALDO GUEVARA, et al,	)	JURY TRIAL DEMANDED
	)	
Defendants.	)	

**DEFENDANTS GERI LYNN YANOW, AS SPECIAL REPRESENTATIVE FOR
ERNEST HALVORSEN, DECEASED, STEPHEN GAWRYS, ANTHONY RICCIO,
ROBERT BIEBEL, AND CITY OF CHICAGO’S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO ANSWER PLAINTIFFS’ COMPLAINTS**

Defendants Geri Lynn Yanow, as Special Representative for Ernest Halvorsen (deceased), Stephen Gawrys, Anthony Ricco, Robert Biebel, and City of Chicago, by their attorneys of record, move this Court for an extension of time until May 6, 2024, to file their Answers to Plaintiff Madeline Mendoza’s and Plaintiff Marilyn Mulero’s Complaints, and in support state:

1. On October 31, 2023, this Court granted Defendants’ Joint Motion for Consolidation in part, finding that *Mendoza v. City of Chicago, et al.*, No. 23-CV-2441, is related to *Mulero v. Guevara, et al.*, No. 23-CV-4795, and that *Mulero* should be reassigned to this

Court. Dkt. 50.

2. On April 8, 2024, this Court denied Defendants' Partial Motion to Dismiss. Dkt. 58. Consequently, pursuant to Fed. R. Civ. P. 12(a)(4)(A), Defendants' Answers to the Complaints in both cases are due by April 22, 2024.

3. The above-named Defendants request an additional fourteen days, or until May 6, 2024, to file their Answers to the Complaints in both cases. Not only must Defendants file Answers in separate cases, but the *Mulero* Complaint consists of 229 paragraphs, many of which contain multiple factual allegations.

4. Defendants have advised counsel for both Plaintiffs that they intend to file this Motion, and Plaintiffs do not oppose it.

WHEREFORE, Defendants respectfully ask this Court to grant their motion to extend the time for them to answer the *Mendoza* and *Mulero* Complaints to May 6, 2024.

Dated: February 2, 2024

Respectfully submitted,

/s/ George J. Yamin, Jr.
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CERTIFICATE OF SERVICE

I certify that on April 18, 2024, I electronically filed the foregoing **Defendant Officer's and Defendant City of Chicago's Unopposed Motion for Extension of Time to Answer Complaints**, with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants listed in the below service list:

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