

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

MICHAEL JONES, )  
 )  
 Plaintiff, ) Case No. 23-cv-04975  
 )  
 v. ) Honorable Judge Georgia N. Alexakis  
 ) Magistrate Judge Albert Berry III  
 )  
 CITY OF CHICAGO, et al., )  
 )  
 Defendants. )

**DEFENDANT CITY OF CHICAGO'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE THE PARTIES' JOINT STATUS REPORT**

NOW COMES Defendant City of Chicago (the “City”), by and through their undersigned counsel, Nathan & Kamionski LLP, respectfully move this Court for entry of an order extending the time for the parties to file a joint status report regarding a settlement conference from November 24, 2025 (Dkt. No. 115), to December 12, 2025. In support thereof, the City state as follows:

1. On October 21, 2025, this Court requested the parties to submit a joint status report regarding an update on their efforts to finish up fact discovery and for the parties to inform the Court as to whether they would like to proceed with a settlement conference or with expert discovery. (Dkt. No. 115).

2. Since then, specifically on November 3, 2025, the City received Plaintiff's first settlement demand.

3. The City is reviewing Plaintiff's demand but needs more time than initially anticipated to complete its review and make an informed decision as to whether a settlement conference will be helpful.

4. Given these circumstances, the City requests additional time, or until December 12, 2025, for the parties to file a joint status report to update this Court on whether they intend to proceed with a settlement conference or expert discovery.

5. The parties can still file a joint status report on November 24, 2025, to update this Court on their efforts to finish up fact discovery, however there are ongoing discussions with Plaintiff as to discovery and therefore a full reset of the pending dates to December 12, 2025, is requested.

6. Defendants conferred with the other parties via email on November 17, 2025, and the other parties had no objection to the extension. However, counsel for the individual defendants start a trial before Judge Alexakis on December 8, 2025. Their ability to review a status report may be delayed and therefore request that this status report relate only to issues between the City and Plaintiff.

7. The City is mindful of the Court's time and resources (as well as all parties' and their respective counsels' resources). This motion is brought in good faith and not for the purpose of causing undue delay but rather to fully consider resolution of the matter.

WHEREFORE the City respectfully requests that this Honorable Court grants its motion for an extension of time for the parties to file a joint status report regarding a settlement conference to December 12, 2025.

Dated: November 18, 2024

Respectfully submitted,

/s/ *Breana L. Brill*  
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**CERTIFICATE OF SERVICE**

I, Breana L. Brill, the undersigned attorney, hereby certify that I filed the foregoing document with the Court's CM/ECF system on the date stamped on the above margin, which simultaneously send electronic notice to all counsel of record.

/s/ Breana Brill