

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

MICHAEL JONES,	)	
	)	
Plaintiff,	)	Case No. 2023-cv-04975
	)	
v.	)	
	)	
CITY OF CHICAGO, et al.,	)	Honorable Judge Joan Gottschall
	)	Magistrate Judge Jeffrey Cole
Defendants.	)	

**DEFENDANTS' UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE ITS RESPONSIVE PLEADING**

NOW COME Defendant City of Chicago (the “City”), by and through its attorneys, Nathan & Kamionski LLP, Assistant Corporation Counsel of the City of Chicago, Defendant Officer David Salgado, through his attorney Special Assistant Corporation Counsel Borkan & Scahill, Ltd., and Defendant Officers Bryan Cox, Peter Theodore, and Rocco Pruger, respectfully move this Court for entry of an order extending the time to October 20, 2023 to file motions to dismiss Plaintiff’s Complaint. In support thereof, Defendants state as follows:

1. On July 31, 2023, Plaintiff filed his Complaint alleging various constitutional and state law claims as well as a *Monell* claim against the City. *See* Dkt. #1.
2. Defendant City has until October 2, 2023, to file an answer or otherwise respond to Plaintiff’s Complaint. Individual Defendants also have responsive pleadings due in a similar time frame.
3. Defendants have been diligently working to prepare each of their motions to dismiss Plaintiff’s Complaint.

4. However, due to multiple Jewish holidays during the month of September and other scheduling issues, Defendants require additional time to draft their respective responsive pleadings, evaluate if a motion to dismiss should be file, and to complete their review of records and information with their clients.

5. Given these circumstances, Defendants request additional time, or until October 20, 2023, to file its motion to dismiss.

6. Defendants conferred with Plaintiff's counsel by email on September 26, 2023, and Plaintiff's counsel had no objection to the extension so long as the initial status report scheduled to be due on October 4, 2023, is also reset to a later date.

7. Therefore the Defendants also request the Joint Status Report currently set for October 4, 2023 be reset until a time convenient for the Court after the October 20, 2023 responsive pleading deadline. This will allow the parties to jointly provide the Court a more fulsome status that also takes into account the responsive pleadings.

8. This motion is brought in good faith and not for the purpose of causing undue delay. Moreover, no prejudice will result from the granting of this motion as no trial date has been set in this matter.

WHEREFORE Defendants respectfully request that this Honorable Court grants their motion for an extension of time to file motions to dismiss on or by October 16, 2023.

Dated: September 28, 2023

Respectfully submitted,

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