

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.,) Joan Gottschall, District Court Judge
Defendants.) Jeffrey Cole, Magistrate Judge

DEFENDANTS' JOINT UNOPPOSED MOTION FOR LEAVE TO FILE IN EXCESS

The City of Chicago (the “City”), by and through its attorneys, Nathan & Kamionski LLP, Special Assistant Corporation Counsel for the City of Chicago, hereby submits its motion for leave to file its joint reply in further support of the motion to dismiss Plaintiff’s Complaint pursuant to Fed. R. Civ. P. 12(b)(6) in excess. In support of its motion, the City states as follows:

1. This lawsuit, which stems from Plaintiff's March 31, 2015, arrest for drug possession, alleges various constitutional and state law claims. *See* Dkt. #1. Plaintiff asserts the following claims against the Defendant Officers: false arrest under the Fourth Amendment, unlawful detention without probable cause under the Fourth Amendment, fabrication of evidence under the Fourteenth Amendment, and derivative claims of conspiracy and failure to intervene. Plaintiff is additionally alleging a *Monell* claim and state-law malicious prosecution claim against the City. *Id.*

2. Defendant Officers and the City jointly moved to dismiss Plaintiff's Complaint and are now jointly filing a reply in further support of the motion to dismiss.

3. Local Rule 7.1 provides that no “brief in support of … any motion … shall exceed 15 pages without prior approval of the court.” NDIL-LR 7.1.

4. In order for the Defendants to jointly and adequately raise its arguments in response to Plaintiff's claims and allegations, the City's brief requires nineteen (19) pages.

5. Local Rule 7.1 further provides that a brief exceeding “the 15 page limit must have a table of contents with the pages noted and a table of cases.” NDIL-LR 7.1.

6. The City’s joint brief will contain a table of contents with the pages noted and a table of cases in order to comply with Local Rule 7.1.

7. Counsel for the City conferred with Plaintiff’s counsel via email on January 12, 2024, and Plaintiff’s counsel does not oppose this motion.

8. Thus, based on the good cause shown, in order to fully brief the Court on the Defendants’ arguments, the City requests that it be given leave to file its brief in support of its motion to dismiss, comprising of nineteen (19) pages in length.

WHEREFORE, the City respectfully requests this Honorable Court to grant it leave to file a brief in excess of fifteen pages and for such other relief which this Court deems proper.

Dated: January 12, 2024

Respectfully submitted,

/s/ Breana Brill

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CERTIFICATE OF SERVICE

I, 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