

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

TARIQ ANDERSON,)
Plaintiff,)
) Case no. 23-CV-14208
)
v.) Chief Judge Pallmeyer
)
HUMBERTO LOZANO,)
Defendant.)
)
)

**DEFENDANTS' MOTION FOR EXTENSION
OF TIME TO FILE AN ANSWER TO COMPLAINT**

Defendant, HUMBERTO LOZANO, through their attorney, Kwame Raoul, Illinois Attorney General, hereby move for an extension of time under Fed. R. Civ. P.6(b)(1)(A) to file an answer to plaintiff's complaint within 28 days by January 31, 2024. In support thereof, Defendant state as follows:

1. Plaintiff is an inmate incarcerated within the Illinois Department of Corrections. Plaintiff filed this suit pursuant to 42 U.S.C § 1983 alleging excessive force. Dkt. 1.
2. On December 10, 2023 plaintiff served Defendant Humberto Lozano. Dkt. 9.
3. On December 18, 2023 undersigned attorney was assigned this case and filed his appearance on this case. Dkt. 10.
4. Along with this case, the undersigned attorney has also been assigned many other cases, including an evidentiary, *Pavey* hearing spanning two cases with the same Plaintiff in the Northern District of Illinois, 20-cv-5383 and 20-cv-5368.
5. Although the undersigned has been diligently working on this matter, due to the new slate of cases, he requires more time to file his answer to plaintiff's complaint.

6. Due to the above, the undersigned respectfully requests leave to file an answer to plaintiff's complaint within 28 days by January 31, 2024. The undersigned sincerely apologizes to both the Court and Plaintiff for this inconvenience.
7. Moreover, the Office of Illinois Attorney General is still evaluating whether it will accept coverage for this matter pursuant to the State Employee Indemnification Act, 5 ILCS 350/1.
8. This motion is brought in good faith and not for purposes of undue delay or any other improper purpose. In addition, the parties will not be unduly prejudiced should this motion be granted.

WHEREFORE, Defendants request (1) their motion be granted and they be given leave to file an answer to Plaintiff's complaint within 28 days by January 31, 2024; and (2) for such further relief as the Court finds reasonable and just.

Dated: January 3, 2024

KWAME RAOUL
Attorney General of Illinois

Respectfully submitted,

/s/ Manasseh A. Konadu
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CERTIFICATE OF SERVICE

The undersigned certifies that on January 3, 2024, he electronically filed the foregoing document with the Clerk of the Court for the Central District of Illinois by using the CM/ECF system. All participants in the case are registered CM/ECF users who will be served by the CM/ECF system. Additionally, the foregoing document was served upon the individuals named below at the addresses below.

/s/ Manasseh A. Konadu _____

Manasseh A. Konadu