

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

Jose Tinajero,)	
)	
<i>Plaintiff,</i>)	No. 24-cv-1598
)	
-vs-)	(Judge Alexakis)
)	
City of Chicago, et al.,)	(Magistrate Judge McNally)
)	
<i>Defendants.</i>)	

**MOTION FOR EXTENSION OF TIME
TO MAKE EXPERT DISCLOSURES**

Plaintiff, by counsel, respectfully requests that the Court enter the same amended expert schedule that it entered in the companion cases, *Martinez v. Guevara*, 23-cv-1741, and *Kelly v. Guevara*, 24-cv-5354:

Affirmative disclosures are due 11/26/25. Rebuttal disclosures are due 1/21/26. Expert discovery to be completed by 2/27/26.

Grounds for entry of the amended order is set out in the motions filed in the companion cases. ECF No. 282 in 23-cv-1741 and ECF No. 147 in 24-cv-5354.

Respectfully Submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave Ste 201
Chicago, IL 60604-2430
(312) 427-3200
Attorneys for Plaintiff Tinajero