

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JOSE TINAJERO, )  
Plaintiff, ) Case No: 24-cv-1598  
-vs- )  
CITY OF CHICAGO, et al., ) Judge John F. Kness  
Defendants. )

**DEFENDANT COOK COUNTY'S UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant, Cook County (“Defendant County”), by and through its attorney, KIMBERLY M. FOXX, State’s Attorney of Cook County, through her assistant Kelli Huntsman, pursuant to Fed. R. Civ. P 6(b) and states as follows:

1. On February 26, 2024, Plaintiff submitted his Complaint to the Court. (Dkt. #1.)
2. On February 29, 2024, a summons was returned executed as to Defendant County, and Defendant County's responsive pleading was due March 21, 2024. (Dkt. #5.)
3. Counsel for Defendant County was first assigned this case and filed her appearance in this matter on March 21, 2024. (Dkt. #8.)
4. Undersigned counsel respectfully requests an additional sixty days to prepare a responsive pleading to Plaintiff's allegations in Plaintiff's Complaint, up to and including May 20, 2024.
5. This is Defendant County's first motion for extension of time to answer or otherwise plead.
6. On March 21, 2024, undersigned counsel reached out to Plaintiff's counsel via email, requesting an extension to May 20, 2024, and Plaintiff has no objection to this extension.

request. This Motion is brought for good cause and Plaintiff will not be prejudiced if Defendant County's Motion is granted.

WHEREFORE, Defendant County, respectfully requests that this Court grant the following relief:

- a. Extending the date for Defendant County to file its answer or responsive pleading, up to and including May 20, 2024; and
- b. Any other relief this Court deems necessary and just.

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

By: /s/ Kelli Huntsman  
Kelli Huntsman  
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#### **CERTIFICATE OF SERVICE**

I, Kelli Huntsman, Assistant State's Attorney, hereby certify that I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Northern District of Illinois Eastern Division by using the CM/ECF system on March 21, 2024.

/s/ Kelli Huntsman  
Kelli Huntsman  
Assistant State's Attorney