

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

LONDON WEEKLY)
)
 Plaintiff,)
)
 v.) No. 24-cv-04752
)
 CITY OF CHICAGO, RONALD WATTS,)
 ALVIN JONES, and KENNETH YOUNG)
 JR.,)
)
 Defendant.)

**DEFENDANT RONALD WATTS' UNOPPOSED
MOTION FOR EXTENSION OF TIME TO FILE RESPONSIVE PLEADING**

Defendant, RONALD WATTS (“Defendant”), by his attorneys, JOHNSON & BELL, LTD, for his unopposed motion for an extension of time to file a responsive pleading, up to and including September 30, 2024, states as follows:

1. The undersigned counsel have been retained to represent Defendant Ronald Watts in this matter, and have filed appearances today. (Dkts. 24-25).
2. Defendant’s responsive pleading is due on September 16, 2024. (Dkt. 23).
3. Defendant requests an extension of time up to and including September 30, 2024, to file his responsive pleading.
4. Plaintiff’s complaint consists of seven separate counts and 64 paragraphs. (Dkt. 1).
5. This request is not sought for purposes of delay but is needed to allow Defendant’s counsel time to gather information and investigate the allegations in plaintiff’s complaint.
6. No prejudice will be suffered by any party as a result of the requested extension.

7. The undersigned contacted plaintiff's counsel concerning this motion, who indicated the motion could be presented as unopposed.

By: /s/ Lisa M. McElroy
Special Assistant Corporation Counsel
Attorney for Defendant, Ronald Watts

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CERTIFICATE OF SERVICE

I, Lisa M. McElroy, an attorney, hereby certify that on September 16, 2024, I caused to be filed with the Clerk of the Court's CM/ECF system a copy of the DEFENDANT'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO FILE A RESPONSIVE PLEADING which simultaneously served copies on all counsel of record via electronic notification.

/s/ Lisa M. McElroy