

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

Jerome Fears,)	
)	
Plaintiff,)	
)	
)	Case No. 24-cv-5101
Vs.)	Honorable Matthew F. Kennelly
)	Mag. Hon. Sheila M. Finnegan
Officer Elias Agredano (#15210), and)	
CITY OF CHICAGO,)	
)	
Defendants.)	

**DEFENDANT AGREDANO’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD**

Defendant, Officer Elias Agredano, by and through his attorneys, JOHNSON & BELL, LTD., respectfully requests this Honorable Court grant an extension until September 9, 2024, to respond to Plaintiff’s Complaint, and in support thereof states as follows:

1. Plaintiff filed his complaint on June 19, 2024. [Dkt. #1].
2. According to the docket, summons was issued as to Defendant Ofc. Agredano on June 21, 2024.
3. Summons was received by the Chicago Police to facilitate service of Defendant Ofc. Agredano on July 11, 2024.
4. Defendant Ofc. Agredano was served with Plaintiff’s summons and complaint on July 16, 2024.
5. Undersigned counsel was recently assigned this matter, and needs additional time to confer with his client, and learn more about the incident that forms the basis of the complaint

in this case. Additional time is also necessary to allow for counsel and Defendant Agredano to determine how to respond to Plaintiff's complaint.

6. Plaintiff will not be prejudiced by this extension. Defendants will be significantly prejudiced should this extension be denied. Undersigned counsel has conferred with Plaintiff's counsel about this request, and Plaintiff's counsel has indicated that he does not oppose this motion.

Defendant Elias Agredano respectfully requests that this Honorable Court grant an extension until September 9, 2024, to file his responsive pleading to Plaintiff's complaint, as set forth above.

Respectfully submitted,

By: /s/ Brian P. Gainer
Attorney for Defendant, City of Chicago

Brian P. Gainer (gainerb@jbltd.com)
Lisa M. McElroy (mcelroyl@jbltd.com)
Jack A. Gainer (gainerj@jbltd.com)
Johnson & Bell, Ltd.
33 W. Monroe St., Ste. 2700
Chicago, Illinois 60603
(312) 372-0770

CERTIFICATE OF SERVICE

I, Brian P. Gainer, hereby certify that, in accordance with Fed. R. Civ. P. 5 and LR 5.5 and the General Order on Electronic Case Filing (ECF), I served this Notice, together with the documents herein referred, electronically via the ECF-CM system on August 2, 2024.

/s/ *Brian P. Gainer*

Brian P. Gainer