

**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 CITY OF CHICAGO’S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant, the City of Chicago, by and through its attorneys, JOHNSON & BELL, LTD., respectfully requests this Honorable Court grant an extension of forty-five (45) days, 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. Plaintiff’s counsel submitted a summons and a copy of the complaint to the City of Chicago June 21, 2024. [Dkt. #4].
3. 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 City of Chicago to determine how to respond to Plaintiff’s complaint.
4. Undersigned counsel also expects to represent Defendant Officer Elias Agredano in this matter, but Defendant Agredano has not yet been served, so no appearance can be filed on

his behalf at this time. Once service of Defendant Agredano occurs, it is anticipated that a similar request for additional time will be made on his behalf.

5. 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 City of Chicago respectfully requests that this Honorable Court grant an extension of forty-five (45) days, until September 9, 2024, to file its responsive pleading to Plaintiff's complaint, as set forth above.

Respectfully submitted,

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

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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 July 26, 2024.

/s/ Brian P. Gainer

Brian P. Gainer