

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

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT**

Defendants, Crystina Kittrell and Richard Rodriquez, Jr., (collectively, "Defendants") by and through their undersigned attorneys, respectfully request that this Honorable Court extend the time for Defendants to answer or otherwise plead to Plaintiff's complaint, up to and including January 26, 2026. In support of this motion, Defendants state the following:

1. On August 13, 2025, Plaintiff filed his Complaint [Dkt. 1].
2. On October 10, 2025, David Condon, Corporation Counsel for the City of Chicago, filed his appearance on behalf of Defendants Kittrell and Rodriguez.
3. On November 14, 2025, this Court granted an extension of time for Defendants Kittrell and Rodriguez to answer or otherwise plead in response to the Complaint, until December 4, 2025. [Dkt. 21].
4. On December 4, 2025, this Court granted an extension of time for Defendants Kittrell and Rodriguez to answer or otherwise plead in response to the Complaint, until January 5, 2026.

5. On December 23, 2025, this Honorable Court granted Defendants' Motion for Leave to Withdraw Attorney, David Condron, and Substitute Brian Gainer, Lisa McElroy, and Jack Gainer, of Johnson & Bell Ltd. as their counsel.

6. On or before December 23, 2025, Brian Gainer, Lisa McElroy, and Jack Gainer, of Johnson & Bell Ltd., filed their appearance on behalf of Defendants, Kittrell and Rodriquez.

7. Undersigned counsel was recently assigned this matter and needs additional time to confer with Defendants Kittrell and Rodriquez and learn more about the incident which forms the basis of the Complaint in this case. Additional time is also necessary to allow for counsel and Defendants to determine how to respond to Plaintiff's Complaint.

8. This request is not made for the purpose of delay or for any other improper purpose.

9. Plaintiff will not be prejudiced if Defendants' motion is granted. Defendants will be significantly prejudiced if this motion is 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.

Defendants, Kittrell and Rodriquez, respectfully request this Honorable Court grant an extension of time, up to and including January 26, 2026, to plead in response to Plaintiff's Complaint [Dkt. 1], as set forth above.

Dated: December 23, 2025

Respectfully submitted,

/s/ Jack A. Gainer
One of the Attorneys for Defendants

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 certify that I served this motion by electronically mailing a copy to each person to whom it is directed at the address above indicated by using the CM/ECF system on December 23, 2025

Respectfully submitted,

/s/ Jack A. Gainer
One of the Attorneys for Defendants

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
Firm ID 06347
(312) 372-0770