

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

DEAN WILHOITE, individually and	)	
for other similarly situated,	)	
	)	
Plaintiffs,	)	No. 2024-cv-01827
vs.	)	
	)	Honorable Jeffrey I. Cummings
SHERIFF OF COOK COUNTY AND	)	
COOK COUNTY, ILLINOIS;	)	Mag. Judge Heather K. McShain
	)	
Defendants.	)	

**NOTICE OF MOTION**

TO: Joel Flaxman  
Law Offices of Kenneth N. Flaxman P.C.  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
jaf@kenlaw.com

PLEASE TAKE NOTICE that on **December 17, 2025, at 11:00 a.m.** I shall appear before the Honorable John Robert Blakely in Courtroom 1288, on behalf of Defendant Cook County, and then and there present the **First Unopposed Motion for Extension of Time to Answer or Otherwise Plead** a copy of which is attached and served upon you.

Respectfully Submitted,

EILEEN O'NEILL BURKE  
State's Attorney of Cook County

By: /s/ Elizabeth F. Brogan

Elizabeth F. Brogan  
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### CERTIFICATE OF SERVICE

I, Elizabeth F. Brogan, hereby certify that on December 10, 2025, I caused a true and correct copy of **First Unopposed Motion for Extension of Time to Answer or Otherwise Plead** to be filed through the Court's CM/ECF system the foregoing document, a copy of which will be electronically mailed to the parties of record.in accordance with the rules regarding filing and service of documents.

/s/ Elizabeth F. Brogan

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