

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

| | | |
|---------------------------------|---|------------------------------|
| DEAN WILHOITE, individually and |) | |
| for other similarly situated, |) | |
| |) | |
| Plaintiffs, |) | No. 2025-cv-13955 |
| |) | |
| vs |) | |
| |) | Honorable John Robert Blakey |
| SHERIFF OF COOK COUNTY AND |) | |
| COOK COUNTY, ILLINOIS; |) | |
| |) | |
| Defendants. |) | |

**CORRECTED FIRST UNOPPOSED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

NOW COMES Defendant, COOK COUNTY, by their counsel, EILEEN O'NEILL BURKE, State's Attorney of Cook County, and through her assistants, Elizabeth F. Brogan and Jeremiah J. Kemper, pursuant to Rule 6 of the Federal Rules of Civil Procedure, now moves this court for an extension of time to answer Plaintiff's Complaint for good cause shown. In support thereof, Defendants state as follows:

1. On November 13, 2025, the Plaintiff filed his Complaint against Cook County and Sheriff of Cook County. (ECF No. 1.)
2. On or about November 24, 2024, the undersigned defense counsel was assigned to represent Defendants Sheriff Thomas Dart and Cook County.
3. On December 2, 2024, ASA Elizabeth F. Brogan entered her appearance for Defendants Sheriff Thomas Dart and Cook County.
4. Cook County was returned executed as to Cook County on November 20, 2025, and their answer is due December 11, 2025.

5. Sheriff of Cook County Thomas Dart waived service on December 3, 2025, and their responsive pleading will be due on January 13, 2026.

6. Due to recently having been assigned to the matter, as well as other professional and personal obligations on the part of Defendant's counsel, and to consolidate filings so that both responsive pleadings for Defendants Cook County and Sheriff Thomas Dart may be filed together, Defendant requests that the responsive pleading for Cook County be due on January 13, 2026 alongside Sheriff of Cook County Thomas Dart's responsive pleading.

7. This is Defendant Cook County's first request for an extension of time.

8. Defense counsel communicated with Plaintiff's Attorney via e-mail, who indicated that they would not oppose a motion for extension of time to answer or otherwise plead for Cook County.

9. This motion is brought in good faith and not for an improper purpose.

10. No prejudice is expected to be suffered by any party as a result of the requested extension.

WHEREFORE, Defendant Cook County, respectfully requests this Honorable Court grant its Motion and enter an order permitting Defendant an extension of time to properly respond to the Plaintiff's Complaint through and including January 13, 2026.

Respectfully submitted,

KIMBERLY FOXX
State's Attorney of Cook County

By: /s/ Elizabeth F. Brogan

Elizabeth F. Brogan
Jeremiah J. Kemper
Assistant State's Attorneys

Cook County State's Attorney's Office
500 Richard J. Daley Center
Chicago, Illinois 60602
elizabeth.brogan@cookcountysao.org
jeremiah.kemper@cookcountysao.org
(312) 603-6638