

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

LIMORRIS BELL,)	
)	
Plaintiff,)	No. 25-CV-09679
)	
v.)	Judge: April M. Perry
)	
CITY OF CHICAGO, <i>et al.</i>)	
)	
Defendants.)	

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

Defendant City of Chicago (“the City”), by and through one of its attorneys, Simerdeep Kaur, Assistant Corporation Counsel for the City of Chicago and Defendants Joseph Vecchio, Crystina Kittrell, and Richard Rodriquez (“Defendant Officers”), by and through one of their attorneys, Dave Condron, Assistant Corporation Counsel Supervisor, for the City of Chicago requests, pursuant to Fed. R. Civ. P. 6(b)(1)(A), that this Honorable Court extend the time by thirty (30) days for the Defendants to answer or otherwise plead to Plaintiff’s complaint. In support of this unopposed motion, the Defendants state as follows:

1. On August 13, 2025, Plaintiff filed his complaint, alleging violations of his civil rights pursuant to 42 U.S.C. § 1983. Dkt. No. 1.
2. Defendant Joseph Vecchio was served on August 21, 2025. Defendant Crystina Kittrell was served on August 21, 2025. Defendant Richard Rodriquez was served on August 21, 2025. The City waived service.
3. On October 10, 2025, Defendants filed a joint, unopposed motion for extension of time to file their respective responsive pleadings. Dkt. No. 13, which was granted. Dkt. No. 16.

4. On November 13, 2025, Defendants filed a joint, unopposed motion for extension of time to file their respective pleadings. Dkt. No. 19, which was granted. Dkt. No. 21.
5. Since the filing of this case to present day, one attorney for the City and one attorney for Individual Defendants has left employment with the City of Chicago and withdrawn from this case. Dkt. No.'s 17, 22.
6. Due to the internal staffing changes and operational requirements of the City's law department, a new set of attorneys will be assigned to this matter. Their appearances are forthcoming.
7. New incoming counsel for Defendant Officers will require additional time to meet with Defendant Officers and conduct their diligence, including investigating, gathering, and reviewing the appropriate documents and information in order to accurately respond to the allegations in Plaintiff's complaint.
8. Further, the parties continue to be engaged in discussion to determine the possibility of an early resolution of this matter.
9. Defendants therefore request an additional thirty (30) days to January 5, 2025, for all Defendants to file their respective responsive pleadings.
10. Plaintiff has no objection to the requested extension.
11. Defendants respectfully acknowledge that this is their third extension of time. Defendants do make this request lightly and sincerely appreciate the Court's and opposing counsel's continued patience. Due to the recent and repeated staffing changes within the Department of Law, including the reassignment of this matter to new counsel, additional time is necessary to ensure complete and accurate filings.

12. This motion is being filed in good faith and not for the purpose of undue delay but in order to allow the necessary time the Defendants to file the most accurate response to Plaintiff's amended complaint. No party will be prejudiced by granting the relief sought in this motion.

WHEREFORE, Defendants respectfully requests this Court it an extension of time to answer or otherwise plead to Plaintiff's Complaint, thirty (30) days, up to and including, January 5, 2025 and for any other relief this Court deems just and necessary.

Dated: December 4, 2025.

Respectfully submitted,

s/ Simerdeep Kaur
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One of the Attorneys for Defendant City of Chicago

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