Case: 10-3957

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USESETTUERS

Nos. 10-3957, 10-3965, 11-1016 (consol.)

IN THE UNITED STATES COURT OF APPEALS FOR THE SEVENTH CIRCUIT

NATIONAL RIFLE ASSOCIATION OF)	Appeals from the United States
AMERICA, INC., et al.,)	District Court for the Northern
)	District of Illinois, Eastern Division
Plaintiffs-Appellants,)	
,)	Nos. 1:08-CV-03696
v.)	1:08-CV-03697
)	
CITY OF CHICAGO and VILLAGE OF)	The Honorable
OAK PARK,)	Milton I. Shadur,
, .)	Judge Presiding.
Defendants-Appellees.	í	
	í	•
)	Appeal from the United States
OTIS MCDONALD, et al.,	í	District Court for the Northern.
, , , , , , , , , , , , , , , , , , , ,	í	District of Illinois, Eastern Divisipe
Plaintiffs-Appellants,	í	E A
	í	No. 1:08-CV-03645
v. ·)	MAD E RICUIT
)	The Honorable
CITY OF CHICAGO,) 1	Milton I. Shadur,
off of officerdo,)	The Honorable Milton I. Shadur, Judge Presiding.
Defendant Annalles	<i>)</i>	ounge residing.
Defendant-Appellee.)	

MOTION FOR EXTENSION OF TIME TO FILE APPELLEES' BRIEFS

Defendant-appellee, CITY OF CHICAGO, by its attorney MARA S.

GEORGES, Corporation Counsel of the City of Chicago, moves this Court to extend the time in which to file the appellees' briefs from March 16, 2011, to April 15, 2011, and in support thereof submits the attached affidavit.

Respectfully submitted,

MARA S. GEORGES

Corporation Counsel of the City of Chicago

BY:

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Assistant Corporation Counsel

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STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

AFFIDAVIT

I, SUZANNE M. LOOSE, being first duly sworn, depose and state that I am the Assistant Corporation Counsel of the City of Chicago Law Department's Appeals Division assigned to this case, and, as such, have knowledge of the following:

- 1. The appellees' briefs are due March 16, 2011. Appellees have requested no prior extensions of time to file their briefs.
- 2. During the last few weeks since the appellants' opening briefs were filed, I have been or will soon be occupied with the following matters, in addition to this case:
 - a. Preparing the City appellee's brief in <u>International Brotherhood of Electrical Workers v. Illinois Labor Relations Board</u>, No. 10-1671 (Ill. App. Ct.), filed February 15, 2011. This was a priority because the third extension was marked final.
 - b. Preparing the City's appellee's brief in <u>Ezell v. City of Chicago</u>, No. 10-1325 (7th Cir.), filed February 18, 2011. This case was a priority because two extensions had been taken, and it involves the denial of a preliminary injunction.
 - c. Preparing the City's reply/cross-appellee's brief in <u>Marcatante v. City of Chicago</u>, Nos. 10-2114, 10-2243 (7th Cir.), for which an extension was received and is now due March 16, 2011.
 - d. Preparing the City's appellee's brief in <u>Taylor v. Police Board</u>, No. 10-1156 (Ill. App. Ct.), for which two extensions have been received and is now due April 6, 2011.
- 3. This matter cannot be assigned to anyone else in our division because other attorneys have full caseloads and I am most familiar with these cases since I drafted the City's brief in the first appeal in these cases.
- 4. More time is needed to prepare a draft that responds to the two appellants' briefs and an amicus brief filed in this case; to allow time for supervisory review; and to coordinate with co-appellees to avoid duplicative briefing.

5. Accordingly, I request an extension of time to and including April 15, 2011, to file the brief of the defendants-appellees.

6. I spoke with counsel for Oak Park, Ranjit Hakim, who expressed that Oak Park supports this motion.

SUZANNE M. LOOSE, Attorney

Signed and sworn to before me this 9th day of March, 2011

NOTARY PUBLIC

Official Seal
Sarah Manrriquez
Notary Public State of Illinois
My Commission Expires 11/21/2013

CERTIFICATE OF SERVICE

I certify that I served the attached Motion for Extension of Time to File Appellees' Briefs by placing a copy in envelopes with sufficient postage affixed and directed to the persons named below at the addresses indicated, and depositing those envelopes in the United States mail before 5:00 P.M. on March 9, 2011.

BENNA RUTH SOLOMON, Attorney

Persons served:

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