

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

NATIONAL RIFLE ASSOCIATION	)	
OF AMERICA, INC., DR. KATHRYN TYLER,	)	
VAN F. WELTON,	)	
and BRETT BENSON,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	No. 08 CV 3697
	)	
	)	Judge Milton I. Shadur
THE CITY OF CHICAGO,	)	
	)	
Defendant.	)	

**AGREED MOTION FOR ADDITIONAL  
EXTENSION OF REMAINING LR 54.3 SCHEDULE**

Pursuant to Local Rule 54.3 and Federal Rule of Civil Procedure 54, plaintiffs the National Rifle Association of America, Inc., Dr. Kathryn Tyler, Van F. Welton and Brett Benson, by and through their attorneys, Stephen P. Halbrook and Stephen A. Kolodziej, hereby file this Agreed Motion for an additional extension of the remaining Local Rule 54.3 schedule pertaining to plaintiffs' petition for attorneys fees, and in support hereof state as follows:

1. As the Court is aware, the parties have been engaged in the process of exchanging information regarding plaintiffs' petition for attorney's fees in this case, as required by Local Rule 54.3. The parties have been diligent, have cooperated fully in this process, and have made every effort to comply with the deadlines previously set by the Court. However, due to the volume of materials involved and unavoidable time constraints for both plaintiffs' and defendant's counsel, both sides have previously found it necessary to seek extensions from the Court with respect to the timelines under LR 54.3.

2. The parties have exchanged the information required of them under LR 54.3(d), and plaintiffs have submitted a proposed joint statement pursuant to LR 54.3(e) to defendant for its consideration. However, the undersigned counsel for plaintiffs has conferred with counsel for defendant, and is authorized to represent that the parties agree that in view of the impending holidays and the aforementioned time constraints, additional time is needed for the parties to confer and to finalize and submit their joint statement under LR 54.3(e), and for plaintiffs to prepare and file their motion for attorney's fees pursuant to LR 54.3(f). The parties therefore respectfully request that the Court extend the remaining deadlines under LR 54.3 as follows: (1) the parties' joint statement to be submitted by December 19, 2011; (2) plaintiffs' motion for attorney's fees to be filed by January 19, 2011.

3. The foregoing request for an additional extension is not made for purposes of delay, and is made jointly by the parties in good faith, solely due to necessity.

WHEREFORE, Plaintiffs respectfully request that the Court enter an order extending the remaining due dates under LR 54.3, as follows: (1) the parties' joint statement to be submitted by December 19, 2011; and (2) plaintiffs' motion for attorney's fees to be filed by January 19, 2011.

Dated: November 21, 2011.

**NATIONAL RIFLE ASSOCIATION  
OF AMERICA, INC., Dr. KATHRYN TYLER,  
VAN F. WELTON and BRETT BENSON**  
Plaintiffs

BY: s/ Stephen A. Kolodziej  
One of Their Attorneys

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**CERTIFICATE OF SERVICE**

I, Stephen A. Kolodziej, an attorney, certify that on this, the 21st day of November, 2011, I caused a copy of the foregoing **Agreed Motion for Additional Extension of Remaining LR 54.3**

**Schedule** to be served by electronic filing on:

Michael A. Forti  
Andrew W. Worsack  
William Macy Aguiar  
Rebecca Alfert Hirsch  
City of Chicago - Department of Law  
Constitutional and Commercial -  
Litigation Division  
30 North LaSalle Street, Suite 1230  
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and that I caused a copy to be served by U.S. Mail on:

Ranjit Hakim  
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71 South Wacker Drive  
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s/ Stephen A. Kolodziej

Stephen A. Kolodziej  
Counsel for Plaintiffs