

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

<b>NATIONAL RIFLE ASSOCIATION OF AMERICA, INC., et al.,</b>	)	
	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>No. 08 C 3697</b>
	)	
<b>THE CITY OF CHICAGO, et al.,</b>	)	<b>Judge Milton I. Shadur</b>
	)	<b>Magistrate Judge Keys</b>
<b>Defendants.</b>	)	

**DEFENDANT’S UNOPPOSED MOTION TO EXTEND THE  
SCHEDULE FOR COMPLIANCE WITH LOCAL RULE 54.3(D)**

Defendant City of Chicago (the “City”), by its attorney, Stephen R. Patton, Corporation Counsel for the City of Chicago, respectfully requests that the Court extend the schedule set by the Court in its Order dated September 13, 2011 for compliance with Local Rule 54.3(d) by two weeks. In support thereof, the City states as follows:

1. On July 14, 2011, the Court entered an Order setting the following schedule for the parties to comply with Local Rule 54.3(d): (i) Plaintiffs were to submit the information required by Local Rule 54.3(d)(1)-(4) by August 5, 2011; (ii) the City is to comply with Local Rule 54.3(d)(5) by September 12, 2011; (iii) the parties are to file their joint statement by October 31, 2011; and (iv) Plaintiffs’ motion for attorneys’ fees is due by November 21, 2011.

2. Plaintiffs submitted to the City the information required by Local Rule 54.3(d)(1)-(4) on August 5, 2011. Plaintiffs’ submission is 322 pages and contains affidavits, curriculum vitae, and detailed billing records for five different firms working on the matter.

3. On September 13, 2011, the Court granted the City’s unopposed motion to extend the date for the City to supply the information required under Local Rule 54(d)(5)(D) from

September 12, 2011 to September 26, 2011. The Court also extended the date for the parties to file their joint statement to November 14, 2011 and for Plaintiffs to file their motion for attorneys' fees to December 5, 2011.

4. The City supplied its information pursuant to Local Rule 54(d)(5)(D) on September 26, 2011.

5. Local Rule 54(d)(5) further requires that the City, within 14 days of providing its information under Rule 54(d)(5)(D), "specifically identify all hours, billing rates, or related nontaxable expenses (if any) that will and will not be objected to, the basis for any objections, and the specific hours, billing rates, and related non-taxable expenses that in the parties' respective views are reasonable and should be compensated. The parties will thereafter attempt to resolve any remaining disputes." Local Rule 54 (d)(5).

6. The City's objections were therefore due on October 11, 2011.

7. The City respectfully requests that the Court extend the date for the City to supply Plaintiffs with its objections to October 25, 2011. The City's attorneys assigned to this matter have been working to complete expert discovery in *Pacholski, et al. v. City of Chicago, et al.*, No. 10 C 4184, currently pending before Judge Edmond E. Chang, as well as working on cross motions for summary judgment in matters pending in the Circuit Court of Cook County. Moreover, Plaintiffs' fee submission is voluminous and highly detailed. As a result, the City requires an additional two weeks to submit their objections to Plaintiffs.

8. Counsel for the City conferred with counsel for Plaintiffs on October 14, 2011 regarding this request for an extension, and Plaintiffs' counsel stated that they had no objection provided the remaining dates set in the Court's September 13, 2011 Order are likewise extended for

an additional two weeks.

9. The City's counsel has also conferred with the defendant's attorneys in *National Rifle Association of America, Inc., et al. v. Village of Oak Park*, No. 08-CV-3696, and they likewise will be filing a motion to extend the schedule by two weeks.

**WHEREFORE**, the City respectfully requests that the Court extend: (i) the time for the City to supply Plaintiffs with its objections under Local Rule 54.3(d)(5) to October 25, 2011; (ii) the date for the parties to file their joint statement to November 28, 2011; and (iii) the date for Plaintiffs to file a motion for attorneys' fees to December 19, 2011, and grant the City such further relief as the Court deems just and appropriate.

Date: October 17, 2011

Respectfully submitted,

STEPHEN R. PATTON,  
Corporation Counsel for the City of Chicago

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