

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

**SHAWN GOWDER**

**Plaintiff,**

**v.**

**CITY OF CHICAGO, a municipal  
corporation, the CITY OF CHICAGO  
DEPARTMENT OF ADMINISTRATIVE  
HEARINGS, MUNICIPAL HEARINGS  
DIVISION, SCOTT V. BRUNER, Director  
of the City of Chicago Department of  
Administrative Hearings, the CITY OF  
CHICAGO DEPARTMENT OF POLICE,  
and JODY P. WEIS, Superintendent of  
the City of Chicago Department of Police**

**Defendants.**

**CASE NO. 11-CV-1304**

**DEFENDANTS' UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants City of Chicago (the "City"), City of Chicago Department of Administrative Hearings, Municipal Hearings Division ("DOAH"), Scott Bruner ("Bruner"), City of Chicago Department of Police ("CPD"), and Jody P. Weis ("Weis"), by and through their attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, hereby move for an extension of time to answer or otherwise plead to Plaintiffs' Complaint for Administrative Review, Declaratory Judgment, and Injunctive Relief ("Plaintiff's Complaint" or "Plf. Compl."). In support thereof, Defendants state as follows:

1. Plaintiff originally filed this action in the Circuit Court of Cook County of the State

of Illinois, County Department, Chancery Division on January 12, 2011. Plaintiff alleges, among other things, that the provision of the City's Responsible Gun Ownership Ordinance ("Ordinance") prohibiting approval of an application for a Chicago firearm permit if the applicant has been convicted of unlawful use of a firearm by any court violates his Second Amendment right to bear arms. Plf.'s Compl., ¶¶ 27, 28, 29. He brings both a facial and as applied challenge to the Ordinance under the United States and Illinois Constitutions, as well as seeking administrative review of the denial of his permit application.

2. Although the City was served with this action on January 14, attorneys handling the case did not receive a copy of the Complaint until February 9. DOAH and Bruner were served with the summons and Complaint on January 31, and CPD and Weis were served on February 4. On February 24, 2011, Defendants CPD and Weis removed this action to this Court with the consent of all Defendants.

3. Accordingly, the City's responsive pleading was due on February 14; DOAH and Bruner's responsive pleading is due on March 2, and CPD and Weis's responsive pleading is due on March 7.

4. Because this case presents constitutional issues of first impression that Defendants need time to review and consider, and because Defendants would like to coordinate their date for filing their responsive pleading, Defendants respectfully request that they be granted a 30-day extension from March 7, up to and including April 7, at which time all Defendants will file their responsive pleadings.

5. Counsel for Defendants conferred with counsel for Plaintiff on Thursday, February 24, and he indicated that Plaintiff had no objection to this request.

Wherefore, Defendants respectfully request that the Court grant this motion for extension of time to answer or otherwise plead to Plaintiff's Complaint up to and including April 7, 2011, and for all other relief the Court deems just.

Respectfully Submitted,

MARA S. GEORGES  
Corporation Counsel  
City of Chicago

BY: /s/ Rebecca Alfert Hirsch

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Dated: February 25, 2011

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record for the Defendants, hereby certifies that on February 25, 2011 she served a copy of the foregoing **Defendants' Unopposed Motion For Extension of Time to Answer or Otherwise Plead** on counsel of record listed below by electronic means pursuant to Electronic Case Filing (ECF):

Stephen Kolodziej  
Brenner Ford Monroe & Scott Ltd.  
33 N. Dearborn Street, Suite 300  
Chicago, IL 60602

/s/ Rebecca Alfert Hirsch

