

**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 FILE RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

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, Stephen R. Patton, Corporation Counsel for the City of Chicago, hereby move for a three-week extension of time to file their response to Plaintiff's Motion For Summary Judgment ("Motion"). In support thereof, Defendants state as follows:

1. Plaintiff filed his Motion, together with his memorandum of law and Local Rule 56.1(a)(3) statement of material, undisputed facts in support thereof, on March 19, 2012. Also on

March 19, Mary Shepard and the Illinois State Rifle Association (“ISRA”) filed a motion for leave to file an *amicus* brief in support of Plaintiff’s position. The City does not oppose that motion, which has been noticed before the Court for April 3, 2012 at 9:00 a.m.

2. The City’s response to Plaintiff’s motion is currently due on April 9, 2012, with Plaintiff’s reply to be filed on April 23, 2012.

3. Undersigned counsel, Ms. Hirsch, has recently been assigned to an unforeseen emergency matter, the appeal of the City’s denial of a parade permit for a coalition of groups intending to hold an assembly and protest in conjunction with the upcoming NATO summit in Chicago on May 20, 2012. *See Coalition Against the NATO/G8 v. City of Chicago*, 12 PA 000002. This matter has consumed much of Ms. Hirsch’s time over the last week and is anticipated to continue to do so for the next several weeks.

4. In addition, the City anticipates that certain *amici* will seek leave to file a brief in support of the City’s position and in response to arguments raised in the brief submitted by *Amici Curiae* Mary Shepard and ISRA, should leave to file be granted. Thus, additional time will be necessary to coordinate such anticipated briefing.

5. Accordingly, the City requests a three-week extension, up to and including April 30, 2012, within which to file its response to Plaintiff’s Motion. Because Plaintiff will likely have to consider and respond to arguments of *amici* in support of the City’s position, he requests three weeks, up to and including May 21, 2012, within which to file his reply brief.

6. Counsel for Defendants conferred with counsel for Plaintiff on Wednesday, March 28, 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 file their response to Plaintiff's Motion up to and including April 30, 2012, and for Plaintiff's reply to be due on May 21, 2012.

Respectfully Submitted,

STEPHEN R. PATTON
Corporation Counsel
City of Chicago

BY: /s/ Rebecca Alfert Hirsch

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Dated: March 28, 2012

CERTIFICATE OF SERVICE

The undersigned, an attorney of record for the Defendants, hereby certifies that on March 28, 2012, she served a copy of the foregoing **Defendants' Unopposed Motion For Extension of Time to File Response to Plaintiff's Motion for Summary Judgment** on counsel of record listed below by electronic means pursuant to Electronic Case Filing (ECF):

Stephen Kolodziej
Ford & Britton, P.C.
33 N. Dearborn Street, Suite 300
Chicago, IL 60602

/s/ Rebecca Alfert Hirsch