

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

**NATIONAL RIFLE ASSOCIATION OF
AMERICA, INC., et al.,**

Plaintiffs,

v.

THE VILLAGE OF OAK PARK, et al.,

Defendants.

No. 08 C 3696

**Judge Milton I. Shadur
Magistrate Judge Keys**

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

Defendant Village of Oak Park, by its attorney, Alexandra E. Shea, 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 Village of Oak Park was to comply with Local Rule 54.3(d)(5) by September 12, 2011; (iii) the parties were to file their joint statement by October 31, 2011; and (iv) Plaintiffs' motion for attorneys' fees was due by November 21, 2011.

2. Plaintiffs submitted to the Village of Oak Park the information required by Local Rule 54.3(d)(1)-(4) on August 5, 2011. Plaintiffs' submission is 219 pages and contains affidavits, curriculum vitae, and detailed billing records for multiple firms working on the matter.

3. On September 14, 2011, the Court granted the Village of Oak Park's unopposed motion to extend the date for the Village 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 Village of Oak Park 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 Village of Oak Park, 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 Village of Oak Park's objections were therefore due on October 11, 2011.

7. The Village of Oak Park respectfully requests that the Court extend the date for the Village to supply Plaintiffs with its objections to October 25, 2011. All parties to this case have expressed an interest in having the City of Chicago (in its case *National Rifle Association of America, Inc., et al. v. City of Chicago*, No. 08-CV-3697) and the Village of Oak Park on the same schedule. The City of Chicago requested and was granted its Motion to Extend the Schedule. Moreover, Plaintiffs' fee submission is voluminous and highly detailed. As a result, the Village of Oak Park requests an additional two weeks to submit their objections to Plaintiffs.

8. Counsel for the Village of Oak conferred with counsel for Plaintiffs on October 19, 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 Village of Oak Park's counsel has also conferred with the defendant's attorneys in *National Rifle Association of America, Inc., et al. v. City of Chicago*, No. 08-CV-3697, and they have filed and been granted their motion to extend the schedule by two weeks.

WHEREFORE, the Village of Oak Park respectfully requests that the Court extend: (i) the time for the Village 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 Village of Oak Park such further relief as the Court deems just and appropriate.

Date: October 20, 2011

Respectfully submitted,

Alexandra E. Shea

By: /s/Alexandra E. Shea
One of the Attorneys for
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