

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

DANE HARREL, an individual and)
resident of St. Clair County, Illinois;)
C4 GUN STORE, LLC, an Illinois limited)
liability company;)
MARENGO GUNS, INC., an Illinois)
Corporation;)
ILLINOIS STATE RIFLE ASSOCIATION;)
FIREARMS POLICY COALITION, INC.;)
and)
SECOND AMENDMENT FOUNDATION,)

Plaintiffs,)

v.)

No. 3:23-cv-00141

KWAME RAOUL, in his official capacity as)
Attorney General of Illinois;)
BRENDAN F. KELLY, in his official)
capacity as Director of the Illinois State)
Police;)
JAMES GOMRIC, in his official capacity)
as State’s Attorney of St. Clair County,)
Illinois;)
JEREMY WALKER, in his official capacity)
as State’s Attorney of Randolph County,)
Illinois;)
PATRICK D. KENNEALLY, in his official)
capacity as State’s Attorney of McHenry)
County, Illinois;)
RICHARD WATSON, in his official)
capacity as Sheriff of St. Clair County,)
Illinois;)
JARROD PETERS, in his official capacity)
as Sheriff of Randolph County, Illinois;)
ROBB TADELMAN, in his official)
Capacity as Sheriff of McHenry County,)
Illinois,)

Defendants.)

**DEFENDANT’S MOTION FOR AN EXTENSION OF TIME TO FILE RESPONSIVE
PLEADING TO COMPLAINT AND RESPONSE TO PLAINTIFF’S MOTION FOR
PRELIMINARY INJUNCTION CONSISTENT WITH ALL OTHER DEFENDANTS
IN THIS MATTER**

COME NOW, Defendants JEREMY WALKER and JARROD PETERS, in their official capacity as State's Attorney of Randolph County and Sheriff of Randolph County, respectfully, by and through their undersigned counsel, and for their Motion for Extension of Time to File Responsive Pleading to the Complaint, and Response to Plaintiffs' Motion for Preliminary Injunction, and states as follows:

1. Upon reasonable belief and knowledge, and based upon conversations between counsel for the Defendants and counsel for the Plaintiff, Defendants Walker and Peters were served the Complaint (see Doc. 1), in this matter on January 25, 2023. The service date makes the responsive pleading date to be February 15, 2023.

2. Plaintiffs filed their Motion for Preliminary Injunction (see Doc. 16), on January 25, 2023, the date of service of the underlying Complaint. Upon reasonable belief and knowledge, the preliminary injunction was not served on Defendants Walker and Peters.

3. Defendants respectfully request an extension of time to file a responsive pleading to the Complaint and Motion for Preliminary Injunction up to and including March 1, 2023.

4. As of the date of this filing, this Court has *granted* a Motion for an Extension of Time for Defendant Gormic, Defendant Watson, Defendant Kelly, and Defendant Raoul. The Court's granting of this Motion would allow Defendants Walker and Peters the same extension.

5. This is a complex litigation dealing with an Illinois statute and State and Federal constitutional law. The complexity of the matters addressed in the litigation justify this short extension.

6. This motion is not brought for any improper purpose or to delay this matter.

7. The granting of this motion will not prejudice any party.

WHEREFORE, Defendant JEREMY WALKER, in his official capacity as State's Attorney of Randolph County, and Defendant JARROD PETERS, in his official capacity as Sheriff of Randolph County, respectfully pray that this Honorable Court *grant* their Motion for Extension of Time to File Responsive Pleading to the Complaint and Response to Plaintiffs' Motion for Preliminary Injunction, and for such further relief as this Court deems just and proper.

EVANS & DIXON, L.L.C.



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Attorneys for Jeremy Walker and Jarrod Peters

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February, 2023, I caused the above and foregoing pleading, to be filed with the Clerk of the Court, which will generate an electronic notice constituting service to all parties.



James E. Godfrey, Jr., #6191771