

**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,)

vs.)

No. 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 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.

**DEFENDANTS PATRICK D. KENNEALLY AND ROBB TADELMAN’S AGREED
MOTION FOR EXTENSION OF TIME TO ANSWER AND RESPOND**

Defendants, Patrick D. Kenneally and Robb Tadelman’s (“McHenry County Defendants”),
by their attorneys Patrick D. Kenneally, McHenry County State’s Attorney, and his Assistant
State’s Attorneys, state as follows for Defendants Patrick D. Kenneally and Robb Tadelman’s
Agreed Motion for Extension of Time to Answer and Respond:

1. McHenry County Defendants seek an extension of time to Answer the Complaint and respond to Plaintiffs' Motion for Preliminary Injunction.
2. McHenry County Defendants seek until March 1, 2023 to respond to Plaintiffs' Motion for Preliminary Injunction and March 8, 2023 to answer Plaintiff's Complaint.
3. McHenry County Defendants have conferred with counsel for Plaintiff and have been informed that Plaintiff agrees to the above-referenced extension to answer and respond.

WHEREFORE, McHenry County Defendants Patrick Kenneally and Robb Tadelman request this Honorable Court enter an order granting Defendants Patrick D. Kenneally and Robb Tadelman's Agreed Motion for Extension of Time to Answer and Respond as provided for above, together with any and all other relief as the Court deems appropriate.

Patrick D. Kenneally, McHenry County
State's Attorney

Robb Tadelman, McHenry County Sheriff

By: /s/ Troy C. Owens
One of their Attorneys

Patrick D. Kenneally
McHenry County State's Attorney
Troy C. Owens (6208293)
Assistant State's Attorneys
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CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of February, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all ECF filers.

/s/ Troy C. Owens