

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

CALEB BARNETT, et al.,)	Case No. 3:23-cv-209-SPM
Plaintiffs,)	**designated Lead Case
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
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DANE HARREL, et al.,)	Case No. 3:23-cv-141-SPM
Plaintiffs,)	
)	
v.)	
)	
KWAME RAOUL, et al.,)	
Defendants,)	
)	
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JEREMY W. LANGLEY, et al.,)	Case No. 3:23-cv-192-SPM
Plaintiffs,)	
)	
v.)	
)	
BRENDAN KELLY, et al.,)	
Defendants,)	
)	
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FEDERAL FIREARMS LICENSEES OF ILLINOIS, et al.,)	Case No. 3:23-cv-215-SPM
Plaintiffs,)	
)	
v.)	
)	
JAY ROBERT “J.B.” PRITZKER, et al.,)	
Defendants.)	
)	
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**PLAINTIFFS’ RESPONSE TO STATE DEFENDANTS’
MOTION TO EXTEND DEADLINE FOR EXPERT REPORTS**

Plaintiffs Federal Firearms Licensees of Illinois, Guns Save Life, Gun Owners of America, Gun Owners Foundation, Piasa Armory, Debra Clark, Jasmine Young, and Chris Moore (collectively “FFL Plaintiffs”); Caleb Barnett, Brian Norman, Hood’s Guns & More, Pro Gun and Indoor Range, and National Shooting Sports Foundation, Inc. (collectively “Barnett Plaintiffs”); Dane Harrel, C4 Gun Store, LLC, Marengo Guns, Inc., Illinois State Rifle Association, Firearms Policy Coalition, Inc., and Second Amendment Foundation (collectively “Harrel Plaintiffs”) (FFL Plaintiffs, Barnett Plaintiffs, and Harrel Plaintiffs collectively referred to as “Plaintiffs”), by and through their attorneys, hereby respond to the State Defendants’ Motion to Extend Deadline for Expert Reports as follows:

On May 3, 2024, Defendants Illinois Attorney General Kwame Raoul, Governor JB Pritzker, and State Police Director Brendan F. Kelly filed a motion under Federal Rule of Civil Procedure 6(b)(1)(A), asking this Court to suspend the May 10, 2024, deadline for the parties to exchange written expert reports until sometime after the close of fact discovery. Plaintiffs take no position regarding Defendants’ request.¹ Plaintiffs will be prepared to comply with the Court’s May 10, 2024, deadline. However, so as not to unfairly prejudice Plaintiffs, should the Court grant Defendants any extension of time to exchange expert reports, Plaintiffs respectfully request a commensurate extension.

Dated: May 6, 2024

Respectfully submitted,

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s/ Sean A. Brady

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¹ Plaintiffs note that they do not agree with various of the State’s representations about the status of Plaintiffs’ discovery responses. Those disagreements, however, do not change Plaintiffs’ position on the State’s request.

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Dated: May 6, 2024

s/ Matthew D. Rowen (with permission)

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s/ David G. Sigale (with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2024, an electronic PDF of **PLAINTIFFS’
OPPOSITION TO STATE DEFENDANTS’ MOTION TO EXTEND DEADLINE FOR
EXPERT REPORTS** was sent by electronic mail to the following registered attorneys
participating in the case:

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