



support of this motion.

Respectfully submitted,

KWAME RAOUL  
Attorney General  
State of Illinois

By: /s/ Megan L. Brown  
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## DECLARATION

I, Megan L. Brown, state the following:

1. I am a citizen of the United States over the age of 18. My current business address is 115 South LaSalle Street, Chicago, Illinois 60603. I have personal knowledge of the facts set forth in this declaration. If called upon, I could competently testify to these facts.

2. I am an Assistant Attorney General in the Civil Appeals Division of the Office of the Attorney General of the State of Illinois, and I have been assigned to draft the reply briefs for the State Defendants-Appellants before this court in the appeals docketed as *Barnett v. Raoul*, No. 24-3060; *Harrel v. Raoul*, No. 24-3061; *Langley v. Kelly*, No. 24-3062; and *Federal Firearms Licensees of Illinois v. Pritzker*, No. 24-3063.

3. The State Defendants-Appellants' reply brief is due by June 27, 2025, on no extensions of time. This is the State Defendants-Appellants' first request for an extension of time to file this brief.

4. This motion is being filed at least seven days before the reply brief's due date, as required by 7th Cir. R. 26.

5. I will be unable to draft the reply brief for State Defendants-Appellants in this appeal, have it reviewed through the review process of the Civil Appeals Division and the Solicitor General's Office, finalize it, and file it with this court by June 27, 2025, for the following reasons.

6. On June 24, 2025, I am scheduled to present oral argument on behalf of Respondent Illinois Educational Labor Relations Board in *Bd. of Trs. of Ill. State Univ. v. Ill. Educ. Lab. Rels. Bd.*, No. 4-24-0936, in the Illinois Appellate Court, Fourth District. The case deals with an order of certification and the meaning of certain words in the Illinois Educational Labor Relations Act. Preparation for oral argument is currently a priority in my work schedule because oral argument has already been scheduled.

7. Additionally, in order to competently draft the reply brief in this case, I must address four merits briefs and four amicus briefs together totaling over 200 pages in length, which exceeds the length of response briefs in typical cases.

8. Finally, based on this court's oral argument calendar, extending the time in which Defendants-Appellants have to file the reply brief in this case would provide no obstacle for this courts' scheduling of oral argument during the September 2025 session.

9. On June 18, 2025, I gave notice to Erin Murphy, Matthew Rowen, Nicholas Aquart, and Andrew Lothson, counsel for the Barnett plaintiffs; David G. Sigale and William V. Bergstrom, counsel for the Harrel plaintiffs; Thomas G. Maag, counsel for the Langley plaintiffs; and Sean Brady, counsel for the Federal Firearms Licensees of Illinois plaintiffs that I would be filing a motion for a 31-day motion for extension of time. These attorneys do not object to this request.

10. I do not request this extension of time from June 27, 2025, to July 28, 2025, to file the reply brief in this appeal for purposes of delay, but so that I may try

to meet my professional responsibilities, properly represent my clients, and provide this court with a thorough brief in this case.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on June 19, 2025.

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**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on June 19, 2025, I electronically filed the foregoing State Defendants-Appellants' Motion for Extension of Time to File Brief with the Clerk of Court for the United States Court of Appeals for the Seventh Circuit by using the CM/ECF system.

I certify that the other participants in this appeal, named below, are CM/ECF users and will be served by the CM/ECF system.

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