



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 represent 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 July 28, 2025, on one extension of time. This is the State Defendants-Appellants' second 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 complete the reply brief for State Defendants-Appellants in this appeal, have it reviewed through the regular review process of the Civil Appeals Division, finalize it, and file it with this court by July 28, 2025, for the following reasons.

6. On June 24, 2025, I presented 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 was a priority in my work schedule because oral argument had already been scheduled.

7. I am also responsible for drafting briefs and managing litigation in other matters. For instance, I filed a response brief on June 6th, 2025 in *Champ v. Forcum*, No. 23-3023 (7th Cir.). This case is related to a separate response brief that I am responsible for drafting in *Champ v. Forcum*, No. 23-3022 (7th Cir.), which is due on July 28th, 2025. I am also responsible for drafting a response brief in *Lezona Effoua v. Meehan*, No. 1-25-0220 (Illinois Appellate Court, First Judicial District), which is currently due on July 29th, 2025. Additionally, I am responsible for drafting a response brief in *Arroy v. Clark*, No. 25-1871 (7th Cir.), which is currently due on July 30, 2025. Finally, I am responsible for drafting the response brief in *Boclair v. Jeffreys*, No. 24-2397 (7th Cir.), which is currently due on August 15, 2025.

8. Finally, 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. If granted, the requested extension to August 14, 2025, would still allow briefing to be complete more than five weeks before the September 22, 2025, argument date.

9. On July 16, 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 Carl D. Michel and Sean Brady, counsel for the Federal Firearms Licensees of Illinois plaintiffs, that I would be filing a motion for a 14-day motion for extension of time. The Barnett, Harrel, and Langley plaintiffs do not object to this motion. These attorneys do not object to this request.

10. I do not request this extension of time from July 28, 2025, to August 14, 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 July 17, 2025.

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**CERTIFICATE OF FILING AND SERVICE**

I hereby certify that on July 17, 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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