

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

THOMAS DART, SHERIFF OF)
COOK COUNTY)

Plaintiff,)

v.)

CRAIGSLIST, INC.,)

Defendant.)

Case No. 09 CV 1385

Judge Grady

MOTION FOR EXTENSION OF TIME

NOW COMES the Plaintiff, THOMAS DART, as Sheriff of Cook County, Illinois (“the Sheriff”), by and through his attorneys, QUERREY & HARROW, LTD., and moves this Court for the entry of an Order granting it an extension of time, to July 10, 2009 within which to file its response to Defendant’s Motion to Dismiss.

In support hereof, the Sheriff states:

1. This is a nuisance action based on diversity jurisdiction. The Sheriff’s Complaint alleges Defendant’s website, Craigslist.org, facilitates prostitution.
2. Defendant filed a 12(c) Motion to Dismiss the Complaint on May 5, 2009.
3. Defendant presented the Motion on May 13, 2009. That morning, Defendant announced it was closing its erotic services section and making other changes to its website.
4. Before this Court, counsel for Defendant commented that the changes effectively mooted the case.
5. However, the parties sought, and the Court entered, a briefing schedule. Plaintiff’s Response to Defendant’s Motion to Dismiss is due June 10, 2009.

6. To date, neither the Sheriff nor his counsel have received written documentation about the changes to the website. Nor have they have been apprised of the details of these changes.
7. In order that counsel may properly investigate Craigslist's changes and adequately confer with knowledgeable individuals at the Sheriff's Office in regard to the changes and gauge their impact on prostitution, this extension is requested.
8. The extension will enable the Sheriff to better determine if the case is indeed moot.
9. The extension of time requested will prejudice no party and the request for it is not interposed for any improper purpose, such as to needlessly compound the expense of litigation or to otherwise inconvenience the Court or Defendant.

WHEREFORE, for the above reasons Plaintiff, the Sheriff of Cook County, moves the Court for the entry of an order granting it an extension of time, through July 10, 2009, to respond to Defendant's Motion to Dismiss.

Respectfully submitted,

The Sheriff of Cook County.

By: s/ Daniel F. Gallagher
One of the Sheriff's attorneys

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