

14-03-3038

ARDC: 6269266

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

WILLIAM WHEELER and JOYCE THOMAS,)
)
Plaintiffs,)

Case No. 14 CV 3380

v.)

THE CITY OF CHICAGO, ILLINOIS,)
A Municipal Corporation; and POLICE)
OFFICERS: CONNER, STAR #18863; TIM)
WOOD, STAR #16252; WILLIAM)
HRONOPOULOS, STAR #9785; PATRICK)
KELLY, STAR #16411; PAUL KOPACZ,)
STAR #19705; JOSHUA ZAPATA, STAR #3747;)
KRIS STIPANOV, STAR #9128; NICK)
ZARBOCK, STAR #18904; RICHARD MAHER,)
STAR #1478; JOHN MCKENNA, STAR #14810;)
LARA, STAR #19429; and E.D. HANEY,)
STAR #3591,)
Defendants.)

Judge Shah

MOTION FOR RULING

NOW COMES Defendant Chicago Police Officers JUSTIN CONNER, TIM WOOD, WILLIAM HRONOPOULOS, PATRICK KELLY, PAUL KOPACZ, JOSHUA ZAPATA, KRIS STIPANOV, NICK ZARBOCK, SERGEANT RICHARD MAHER, JOHN MCKENNA, ABRAHAM LARA, E.D. HANEY, (hereinafter "DEFENDANT OFFICERS") and the CITY OF CHICAGO, by and through their attorney, FARAHVAR LAW GROUP, P.C. and for their motion for ruling on the Motion for Summary Judgement and Rule 56.1 Statement of Facts, states as follows:

1. On or about March 9, 2016, Defendants filed a Motion for Summary Judgement and Rule 56.1 Statement of Facts in support of the motion. (Doc. 95, 98)

2. Plaintiff's response to the motion was due on April 22, 2016 (Doc. 92)

3. On April 29, 2016, this Honorable Court granted an extension of time for Plaintiff to file Summary Judgement Motion to May 16, 2016. (Doc. 102)

4. On May 26, 2016, Plaintiff's Second Motion for Extension of Time to File was granted, leaving the response date to May, 31, 2016. (Doc. 108)

5. On June 1, 2016, Plaintiff filed another Motion for Extension of Time to File with a new response due on June 7, 2016. (Doc. 111)

6. On June 10, 2016, Plaintiff's Third Motion for Extension of Time to File a response was granted, leaving a new response date of June 15, 2016. (Doc. 114)

7. On June 16, 2016, Plaintiff's Fourth Motion for Extension of Time was granted again with a file response of June 23, 2016 set by this Honorable Court. (Doc 117)

8. The undersigned has sent numerous emails and correspondence to Plaintiff's counsel requesting a time line as to when a response will be filed with no uncertain date provided.

9. Counsel for the Defendant, a solo practitioner, is currently entering a busy series of months, with travel outside of Chicago and a trial set before this Honorable Court in another matter (Bonner v. O'Toole; Case No. 12-CV-981) which, including preparation, will take much of October 2016.

WHEREFORE, Defendant respectfully requests a ruling on the Motion for Summary Judgement and in the alternative, should Plaintiff file a delayed response to the Summary Judgement Motion, allow Defendant ample time to file a reply, given his upcoming schedule for September and October, 2016.

Respectfully Submitted,

FARAHVAR LAW GROUP, P.C..

/s/ Paul A. Farahvar

Attorney for Defendants

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