

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

ANNABEL K. MELONGO,)
Plaintiff,)

v.)

ASA ROBERT PODLASEK; ASA JULIE)
GUNNIGLE; INVESTIGATOR KATE)
O’HARA (Star No. 423); INVESTIGATOR)
JAMES DILLON (Star No. 1068);)
INVESTIGATOR ANTONIO RUBINO)
(Star No. 5043); INVESTIGATOR RICH)
LESIAK) (Star No. 5000); UNKNOWN)
COOK COUNTY SHERIFF OFFICERS;)
DR. MATTHEW S. MARKOS; ASST.)
ATTY. GENERAL KYLE FRENCH;)
COOK COUNTY SHERIFF THOMAS)
DART; COOK COUNTY;)
INVESTIGATOR RANDY ROBERTS;)
SCHILLER PARK DET. WILLIAM)
MARTIN; VILLAGE OF SCHILLER)
PARK; CAROL SPIZZIRRI)

Case No. 13-C-04924

Hon. John Z. Lee

Defendants.

**DEFENDANT FRENCH’S (SECOND) UNOPPOSED MOTION FOR THREE (3) DAY
EXTENSION OF TIME TO ANSWER THE SECOND AMENDED COMPLAINT**

DEFENDANT FORMER ASSISTANT ATTORNEY GENERAL KYLE FRENCH, by and through his counsel, Illinois Attorney General LISA MADIGAN, respectfully requests a three-day extension of time to file his Answer to the Complaint. As grounds therefore, Defendant states:

1. On June 10, 2015, the Court issued an order denying, in part, Defendants’ motions to dismiss.
2. As part of that Order, the Court ruled that, if the Plaintiff seeks to amend the Complaint, her motion to amend would be due no later than June 26, 2015.

3. Further, the Court ruled that the Defendants' answers are due no later than today, July 7, 2015.
4. Plaintiff did not file a motion to amend her complaint.
5. The Second Amended Complaint is twenty-six pages in length and contains 112 numbered paragraphs.
6. Defendant needs an additional three days to complete and finalize the answer to the Second Amended Complaint.
7. Undersigned counsel did contact counsel for Plaintiff who has indicated that she does not oppose the relief sought.
8. Defendant previously sought and obtained an extension of time to file his motion to dismiss the Second Amended Complaint.
9. The instant motion is not made for purposes of undue delay or any other improper purpose.

WHEREFORE, for the foregoing reasons, Defendant French respectfully requests three additional days, up to and including July 10, 2015 to file an Answer to the Second Amended Complaint, and for such other and further relief as the Court deems proper.

Date: July 7, 2015

Respectfully submitted,

\s\ Thor Y. Inouye
Thor Y. Inouye
Assistant Attorney General
General Law Bureau
100 West Randolph Street, 13th Floor
Chicago, Illinois 60601
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COUNTY SHERIFF OFFICERS; DR. MATTHEW S.)	
MARKOS; LAUREL LAUDIN; ASST. ATTY.)	
GENERAL KYLE FRENCH; COOK COUNTY)	
SHERIFF THOMAS DART; COOK COUNTY.,)	
Defendants.)	

NOTICE OF MOTION

TO: Jennifer Bonjean, 142 Joralemon St., Suite 5 A, Brooklyn, NY 10004
 Christopher Smith, 1 North LaSalle Street, Suite 3040, Chicago, IL 60602
 Stephen L. Garcia and Thomas Edward Nowinski, Cook County State's Attorney, 500 Richard J. Daley Center, Chicago, IL 60602
 Christopher S. Wunder and Eric D Kaplan, Kaplan Papadakis & Gournis, P.C., 180 N. LaSalle Street, Suite 2108, Chicago, IL 60601

PLEASE TAKE NOTICE that on July 28, 2015 at 9:00 a.m., or as soon thereafter as I may be heard, I shall present the attached motion for extension of time before the Honorable Judge John Z. Lee, or anyone sitting in his stead, in courtroom 1225.

Undersigned certifies that the notice and attached motion for extension of time to answer or otherwise plead was electronically served on the above listed individuals *via* CM/ECF.

Date: July 7, 2015

Respectfully submitted,

\s\ Thor Y. Inouye
 Thor Y. Inouye
 Assistant Attorney General
 General Law Bureau
 100 West Randolph Street, 13th Floor
 Chicago, Illinois 60601
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