

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JAMIE HERNANDEZ,	)	
Plaintiff,	)	09-cv-661
vs.	)	Honorable Judge
THOMAS DART, et al.,	)	Robert W. Gettleman
Defendants.	)	

NOTICE OF MOTION

To: Jaime Hernandez

**PLEASE TAKE NOTICE** that on October 8, 2009 at 9:15: a.m., I shall appear before the Honorable Magistrate Judge Robert W. Gettleman in the courtroom usually occupied by him in Room 1703 of the United States District Court, Northern District of Illinois, Eastern Division, and present the attached *Defendant's Motion for an Extension of Time to Answer or Otherwise Plead*.

Respectfully Submitted,

ANITA ALVAREZ  
State's Attorney of Cook County

By: /s/ Michael Jacobs  
Michael Jacobs  
Assistant State's Attorney  
Civil Actions Bureau  
500 Richard J. Daley Center  
Chicago, Illinois 60602  
(312) 603-3401

CERTIFICATE OF SERVICE

I, Michael Jacobs Assistant State's Attorney, hereby certify that the attached motion was served upon the person named above on September 24, 2009, electronically via the ECF-CM system, if possible, and by depositing the same in the U.S. Mail located at 500 Richard J. Daley Center with proper postage prepaid.

/s/ Michael Jacobs  
Michael Jacobs

UNITED STATES DISTRICT COURT  
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Defendants.	)	

**MOTION FOR EXTENSION OF TIME  
TO ANSWER OR OTHERWISE PLEAD**

NOW COME Defendants, Sheriff Tom Dart, Officer Olejarz, Officer Morrissey, Officer Dangles, Officer Boyd, Officer Gayden, Officer Harris, Officer Rodriguez, Officer Mackey, Officer Migleri, Officer Gross, and Officer Reynolds, through their attorney ANITA ALVAREZ, State's Attorney of Cook County, through her assistant, Assistant State's Attorney MICHAEL D. JACOBS, and, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure (FRCP), state as follows:

1. That defendants Sheriff Tom Dart and Officers Olejarz, Morrissey, Dangles, Boyd, Gayden, Harris, Rodriguez, Mackey, Migleri, Gross, and Reynolds have been served.
2. That the above-named defendants' answers were due on or by September 21, 2009.
3. Defendant Officer Rodriguez was served at a later time and his answer is due on or by today's date, September 24, 2009.

3. That Plaintiff's complaint consumes thirty pages and consists of 159 paragraphs of vague, complex, and conclusory allegations against 19 separate defendants.
4. That investigating the factual allegations in the complaint, and the relevant provisions of law, will require substantial time and effort.
5. That undersigned counsel respectfully requests 45 additional days to prepare an appropriate answer or other pleading on behalf of Defendants Sheriff Dart and Officers Olejarz, Morrissey, Dangles, Boyd, Gayden, Harris, Rodriguez, Mackey, Migleri, Gross, and Reynolds.

**WHEREFORE YOUR DEFENDANTS PRAY:**

1. That this Honorable Court grant an enlargement of time, at least 45 days, or until at least November 5, 2009 for the defendants to answer or otherwise plead;
2. That this Honorable Court grants any other relief it deems just.

Respectfully Submitted,

ANITA ALVAREZ  
State's Attorney of Cook County

By: /s/Michael D. Jacobs  
Michael D. Jacobs  
Assistant State's Attorney  
Torts/Civil Rights Litigation Section  
500 Richard J. Daley Center  
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(312) 603-3401