

Exhibit A

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

**BRIDGE STRUCTURAL AND
REINFORCING IRON WORKERS, LOCAL #1**

Plaintiff's

-v-

**LONNIE DANTZLER, individually and d/b/a
D and B CONSTRUCTION, and Kevin Dantzler
Individually.**

Defendant.

Case No. 09 CV 3357

Judge Kennelly

NOTICE OF MOTION

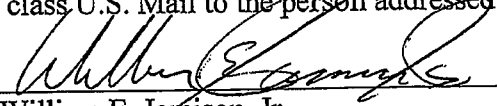
**TO: Raymond J. Sanguinetti
111 East Wacker Drive,, Suite 2600
Chicago, IL 60601**

PLEASE TAKE NOTICE, that on Tuesday, January 5, 2010, at 9:30 a.m., I shall appear before the Honorable Judge Matthew Kenelly or any judge stead in courtroom 2103 at the Everett McKinley Dirksen Federal Building located at 219 S. Dearborn Street, Chicago Illinois and then and there present Defendants' Motion to Extend Time to Respond to Plaintiff's Motion for Summary Judgment.

By: 

CERTIFICATE OF SERVICE

I, William E. Jamison, Jr., an attorney, state that on this 15th day of December 2009, I served this Notice of Motion along with Defendants' Motion to Extend Time to Respond to Plaintiff's Motion for Summary Judgment on the above named party via the courts electronic notification system and first class U.S. Mail to the person addressed above.


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

**BRIDGE STRUCTURAL AND
REINFORCING IRON WORKERS, LOCAL #1**

Plaintiff's

-v-

**LONNIE DANTZLER, individually and d/b/a
D and B CONSTRUCTION, and Kevin Dantzler
Individually.**

Defendant.

Case No. 09 CV 3357

Judge Kennelly

**MOTION TO EXTEND TIME TO RESPOND
TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

NOW COMES, Lonnie Dantzler d/b/a D& B Construction and Kevin Dantzler (the "defendants"), by and through their attorney William E. Jamison, Jr., and moves this honorable court to extend the time for defendant's to file their response to the plaintiff's motion for summary judgment and in support thereof states as follows:

1. That on September 30, 2009, this honorable court entered a briefing schedule for Plaintiff's Motion for Summary Judgment.
2. Pursuant to the order plaintiff was to file its motion by October 28, 2009. Response was to be filed by November 25, 2009, with the reply due by December 11, 2009.
3. That Plaintiff failed to timely file its motion for summary judgment and likewise failed to seek an extension of time to file said motion. The court thereafter

issued a rule to show cause why plaintiff's case should not be dismissed for want of prosecution.

4. Plaintiff thereafter filed its motion for leave to file motion for summary judgment instanter and on November 16, 2009. At the hearing this honorable court entered a modified briefing schedule.

5. The modified briefing schedule requires defendant to file its response by December 15, 2009. Defendant's counsel has several trials and several accountings that are due in the month of December.

6. The initial briefing schedule would not have conflicted with these other set matters. Further counsel for defendant is schedule to be away on vacation from December 21, 2009 through January 4, 2010.

7. That the Plaintiff, Bridge Structural and Reinforcing Iron Workers will not be prejudiced by the extension of time requested by the Defendant.

WHEREFORE, the defendant request a 28 day extension through and including January 12, 2010, to file its response to plaintiff's motion for summary judgment.



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**UNITED STATES DISTRICT COURT
FOR THE Northern District of Illinois – CM/ECF LIVE, Ver 4.0.3
Eastern Division**

Bridge Structural and Reinforcing Iron Workers
Local #1

Plaintiff,

v.

Case No.:
1:09-cv-03357
Honorable Matthew
F. Kennelly

D & B Construction, et al.

Defendant.

NOTIFICATION OF DOCKET ENTRY

This docket entry was made by the Clerk on Tuesday, December 29, 2009:

MINUTE entry before Honorable Matthew F. Kennelly: Plaintiff's motion for extension of time to file response to motion for summary judgment is granted. The response due date is extended to 1/8/10. The reply due date is extended to 1/22/10. This schedule will not be extended again. Motion hearing date of 1/5/10 is vacated. (mk)

ATTENTION: This notice is being sent pursuant to Rule 77(d) of the Federal Rules of Civil Procedure or Rule 49(c) of the Federal Rules of Criminal Procedure. It was generated by CM/ECF, the automated docketing system used to maintain the civil and criminal dockets of this District. If a minute order or other document is enclosed, please refer to it for additional information.

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