

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

ILLINOIS STATE RIFLE)	
ASSOCIATION, et al.,)	
)	No. 14-3064
Plaintiffs,)	
)	JUDGE LEFKOW
v.)	
)	
HIRAM GRAU, et al.,)	
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT OF PLAINTIFFS**

Defendants Hiram Grau, Sergio Acosta, Robinzina Bryant, James Cavanaugh, Virginia Wright, John Chesley, John Diwik, and G. Patrick Murphy, by their attorney Lisa Madigan, the Illinois Attorney General, respectfully request a 35-day extension of time to Answer or Otherwise Plead to the Complaint of Plaintiffs, to and including June 25, 2014. In support of this motion, Defendants state as follows:

1. Plaintiffs filed their Complaint for Injunctive and Declaratory Relief on April 28, 2014. (Doc. 1). Plaintiffs claim that Defendants have denied their application for a concealed and carry firearms permit without due process of law. (*Id.*).
2. Defendants' Answer is due May 21, 2014.
3. The undersigned counsel is an Assistant Attorney General in the General Law Bureau of the Office of the Illinois Attorney General. He, along with Assistant Attorney General Tyler Roland, was assigned this case on Friday, May 9, 2014.

4. Mr. Roland is currently on vacation and will not be back in the office until May 27, 2014.

5. The undersigned cannot adequately respond to the Complaint of Plaintiffs by May 21, 2014 for the following reasons:

a. The undersigned is responsible for filing a motion for summary judgment in Midwest Fence Corp. v. United States Dep't of Transp., et al., No. 10-5627 (N.D. Ill.), which is currently due on June 4, 2014. This case involves a constitutional challenge to the Illinois Department of Transportation's Disadvantaged Business Enterprise Program, and involves volumes of record evidence.

b. The undersigned is responsible for filing a motion to dismiss the complaint in Novak v. Judge Sohpie Hall, et al., No. 14-801 (N.D. Ill.), which is currently due on May 23, 2014.

c. The undersigned was recently assigned to the present case, and has not yet had a chance to confer with his clients to discuss the merits and defenses. Nor has the undersigned had an opportunity to review any relevant documents necessary to adequately respond to the Complaint.

6. On Thursday May 15, 2014, I contacted counsel for the Plaintiffs to inquire as to whether there would be any objection to this request for extension of time. On May 20, counsel for Plaintiffs advised that there was no objection.

7. This is Defendants' first request for extension of time to file their Answer or Otherwise Plead to Plaintiffs' Complaint. This motion is not brought for dilatory purposes, but rather is made so that counsel for Defendants can adequately represent Defendants in accordance with their professional obligations. Nor will allowing Defendants an extension unduly delay the resolution of the issues or prejudice Plaintiffs.

Wherefore, Defendants respectfully request that this Court extend the time within which they must Answer or Otherwise Plead to Plaintiffs' Complaint, to and including June 25, 2014.

LISA MADIGAN
Attorney General of Illinois

Respectfully submitted,

_____/s/ *Sunil Bhave* ____
Sunil Bhave
Assistant Attorney General
100 W. Randolph St., 13th Fl.
Chicago, IL 60601
(312) 814-4450

CERTIFICATE OF SERVICE

I, Sunil Bhave, hereby certify that I have caused true and correct copies of the above and foregoing Unopposed Motion for Extension of Time to Answer or Otherwise Plead to be sent via e-filing to all counsel of record on May 20, 2014, in accordance with the rules on electronic filing of documents.

_____/s/ *Sunil Bhave* ____
SUNIL BHAVE
Assistant Attorney General