

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS DIVISION

TEMPEST HORSLEY,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 13-321
	)	
JESSICA TRAME, in her official capacity	)	
as Chief of the Firearms Services Bureau,	)	
	)	
Defendant.	)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME**

NOW COMES the Defendant, JESSICA TRAME, by and through her attorney, Lisa Madigan, Attorney General for the State of Illinois, and pursuant to Fed. R. Civ. P. 6(b) hereby moves for an extension of time in which to respond to the Complaint, stating as follows:

1. On April 1, 2013, Plaintiff filed her complaint seeking injunctive relief under 42 U.S.C. § 1983 for alleged violations of Plaintiff's rights under the Second and Fourteenth Amendments.
2. On or about April 11, 2013, Defendant executed a waiver of the service of summons.
3. According to the waiver, Defendant's answer or motion under Rule 12 is due May 31, 2013.
4. Counsel for Defendant has had insufficient time to prepare an adequate response to the complaint.

5. Over the past few weeks, counsel for Defendant has been responding to extensive discovery requests in several matters, including:

- a. *People v. Harris*, 13-DT-199; 13-TR-6118 (Ill. Cir. Ct. 2013) (expedited discovery) (Sangamon County);
- b. *People ex rel. Ill. Dep't of Labor v. DKS Trucking, LLC*, 13-LM-15 (Ill. Cir. Ct. 2013) (Livingston County); and
- b. *Ill. Dep't of Corrections v. Crenshaw*, DA-37-13 (Ill. Civ. Serv. Comm'n 2013) (expedited discovery).

6. In addition, counsel for Defendant has devoted significant time to prepare for and attend evidentiary hearings in:

- a. *Murphy v. Grau*, 13-CH-211 (Ill. Ct. Ct. 2013) (Madison County); and
- b. *In re Leonard*, 12-P-108; *In re Gilker*, 12-P-109 (Ill. Cir. Ct. 2013) (Jefferson County) (best interest hearing).

7. Therefore, Defendant requests a fourteen-day extension, up to and including June 14, 2013, in which to answer or otherwise respond to the complaint.

8. On May 28, 2013, the undersigned spoke with counsel for Plaintiff, Thomas Maag, who indicated that he had no opposition to Defendant's request for a fourteen-day extension.

9. This motion is not submitted for the purpose of delay, but in the interest of justice.

WHEREFORE, Defendant, JESSICA TRAME, respectfully requests the Court grant Defendant an extension of fourteen (14) days, up to and including June 14, 2013, in which to answer or otherwise respond to the complaint.

Respectfully submitted,

JESSICA TRAME,

Defendant,

LISA MADIGAN, Attorney General,  
State of Illinois

Attorney for Defendant,

By: s/ Joshua D. Ratz

Joshua D. Ratz, #6293615  
Assistant Attorney General  
500 South Second Street  
Springfield, Illinois 62706  
(217) 785-4555 Phone  
(217) 524-5091 Fax  
E-Mail: [jratz@atg.state.il.us](mailto:jratz@atg.state.il.us)

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	)	
JESSICA TRAME	)	
	)	
Defendant.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on May 31, 2013, the foregoing document, Motion for Extension of Time, was electronically filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Thomas G. Maag  
tmaag@maaglaw.com

and I hereby certify that on May 31, 2013, a copy of the foregoing document was mailed by United States Postal Service, to the following non-registered participant:

None

Respectfully Submitted,

s/ Joshua D. Ratz  
Joshua D. Ratz, #6293615  
Assistant Attorney General