

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

| | | |
|----------------------------|---|--------------------------------------|
| PAUL DUFFY, <i>et al</i> , |) | Case No. 1:13-cv-01569 |
| |) | |
| |) | Removed from: |
| Plaintiffs, |) | |
| |) | The Circuit Court of Cook County, IL |
| v. |) | Case No. 13-L-001656 |
| |) | |
| PAUL GODFREAD, ALAN COOPER |) | Consolidated with 1:13-cv-04341 |
| and JOHN DOES 1-10, |) | |
| |) | |
| Defendants. |) | |

CORRECTED MOTION FOR EXTENSION OF TIME

NOW COME Defendants Paul Godfread and Alan Cooper, by and through counsel, and pursuant to Federal Rule of Civil Procedure 6(b) respectfully move this Court for an extension of time to file their Rule 11 petition, and in support thereof state as follows:

1. Defendant's Rule 11 petition was to be filed by September 4, 2013. [ECF No. 46].
2. Defendants require additional time to obtain information relevant to their petition.
3. This extension of time is not being sought for the purpose of delay or frustration of the progress of this matter.
4. The requested extension will not adversely affect the scheduled status date of November 26, 2013.
5. This is the first request for an extension made by Defendants in this matter.
6. This extension will not unduly burden any of the parties.
7. Defendant has no objection to the Court granting an extension of time for Plaintiff's response to match the extension being requested herein.

WHEREFORE, Defendants Paul Godfread and Alan Cooper respectfully request that this Court grant their Motion for Extension of Time and extend the deadline for the filing of Defendants' Rule 11 Petition through Monday, September 9, 2013, with leave for Plaintiff to respond by September 16, 2013 and Defendants to reply by September 23, 2013.

Respectfully submitted,

/s/ Erin K. Russell

The Russell Firm
233 S. Wacker Drive
84th Floor
Chicago, IL 60606
T: 312-994-2424
F: 312-706-9766
erin@russellfirmchicago.com
ARDC# 6287255

CERTIFICATE OF SERVICE

This is to certify that on September 4, 2013, this document was filed with the Court via the CM/ECF electronic filing system, thereby serving it upon all counsel of record.

/s/ Erin K. Russell