

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS

MICHAEL MOORE; CHARLES HOOKS;)
PEGGY FECHTER; JON MAIER; SECOND)
AMENDMENT FOUNDATION, INC.; and)
ILLINOIS CARRY,)

Plaintiffs,)

-vs-)

No. 11-3134

LISA MADIGAN, in her Official Capacity as)
Attorney General of the State of Illinois; and)
HIRAM GRAU, in his Official Capacity as)
Director of the Illinois State Police,)

Defendants.)

MOTION FOR ENLARGEMENT OF TIME

COME NOW the defendants, LISA MADIGAN, in her official capacity as Attorney General of the State of Illinois, and HIRAM GRAU, in his official capacity as Director of the Illinois State Police, by and through her counsel, LISA MADIGAN, Attorney General of the State of Illinois, and pursuant to Federal Rule of Civil Procedure 6(b), hereby request an enlargement of time to respond to the plaintiffs' motion for attorneys fees. In support thereof, the following statements are made.

1. The defendants' response to plaintiffs' motion for attorneys fees is due today.
2. The undersigned requests ninety days to complete discovery and an additional thirty days to respond to the motion for attorneys' fees [58].
3. Ninety days is necessary to confer on any objections to interrogatory responses prior to the taking of any depositions.
4. This motion is not made for the purpose of delay.

WHEREFORE, for the above and foregoing reasons, defendants respectfully request additional time to complete discovery and respond to plaintiffs' motion for attorneys fees in this cause.

Respectfully submitted,

LISA MADIGAN, in her official capacity as Attorney General of the State of Illinois, and HIRAM GRAU, in his official capacity as Director of the Illinois State Police,

Defendants,

LISA MADIGAN, Attorney General,
State of Illinois,

s/Karen L. McNaught

Karen L. McNaught
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**UNITED STATES DISTRICT COURT
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PEORIA DIVISION**

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Certificate of Service

I hereby certify that on December 30, 2013, I presented the foregoing Motion for Enlargement of Time to the Clerk of the Court for filing and uploading to the CM/ECF system which will send notification of such filing to the following:

dsigale@sigalelaw.com
David@djensenpllc.com

and I hereby certify that on December 30, 2013, I have mailed by United States Postal Service, the document to the following non-registered participant:

Respectfully submitted,
s/Karen L. McNaught

Karen L. McNaught
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