

UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF ILLINOIS

KEVIN W. CULP, et al.,)	
)	
Plaintiff,)	
)	
vs.)	Civil Action No.: 14-3320
)	
LISA MADIGAN, et al.,)	
)	
Defendants.)	

UNOPPOSED SECOND MOTION FOR EXTENSION OF TIME

NOW COME Defendants, LISA MADIGAN, in her Official Capacity as Attorney General of the State of Illinois, HIRAM GRAU, in his Official Capacity as Director of the Illinois State Police, and JESSICA TRAME, in her Official Capacity as Bureau Chief of the Illinois State Police Firearms Services Bureau, by and through their attorney, Lisa Madigan, Attorney General of Illinois, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby move for an extension of time to answer or otherwise respond to the complaint, stating as follows:

1. On December 29, 2015, the Court granted Defendants' motion for extension of time to up to and including January 28, 2015 to answer or otherwise respond to the complaint.
2. Since the entry of the Court's order granting a first extension, the undersigned was out of the office January 5, 2015 through January 9, 2015. Upon returning January 12, 2015, the undersigned was assigned to second chair a trial on January 14, 2015 in *People ex rel. Illinois Department of Labor v. World Painting Co.*, 13-AR-532 and spent January 12-13, 2015 in preparation for that trial. On January 21, 2015, the undersigned received an ex parte temporary restraining order issued in a juvenile court matter handled by the undersigned in Williamson County, Illinois, case no. 07-JA-79. From January 21, 2015 through January 27, 2015, the

undersigned's time was devoted to responding to the ex parte temporary restraining order, involving three trips to Marion, Illinois, three hours each way, culminating in a hearing on a motion to dissolve the temporary restraining order on January 27, 2015. In total, because January 19, 2015 was a state holiday, the undersigned has had only four business days, including January 28, 2015, in which to work on this case, in addition to meeting other deadlines.

3. Therefore, the undersigned requires additional time to adequately respond to the issues and facts alleged in the complaint.

4. Accordingly, Defendants request an extension of 14 days, up to and including February 11, 2015, in which to answer or otherwise respond to the complaint.

5. This motion is not submitted for the purpose of delay, but for the purpose of preparing an adequate defense and in the interest of justice.

6. Defendants do not believe that Plaintiffs will be prejudiced by the granting of this motion.

7. The undersigned contacted Mr. Sigale, counsel for Plaintiffs, to inform him of Defendants' request. Mr. Sigale stated that he would not oppose a fourteen day extension.

WHEREFORE, Defendants request this honorable Court grant Defendants an extension of 14 days, up to and including February 11, 2015, in which to answer or otherwise respond to the complaint.

Respectfully submitted,

LISA MADIGAN, Attorney General of the
State of Illinois, HIRAM GRAU, Director of
the Illinois State Police, and JESSICA
TRAME, Bureau Chief of the Illinois State
Police Firearms Services Bureau,

Defendants,

LISA MADIGAN, Attorney General, State of
Illinois

By: s/ Joshua D. Ratz

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CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2015, the foregoing Unopposed Second Motion for Extension of Time was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing(s) to the following:

David G. Sigale dsigale@sigalelaw.com

and I hereby certify that on January 28, 2015, I mailed by United States Postal Service, the document to the following non-registered participants:

None.

Respectfully submitted,

s/ Joshua D. Ratz
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