

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CRISTINA NICHOLE IGLESIAS)	
(a.k.a. CRISTIAN NOEL IGLESIAS),)	
)	
Plaintiff,)	
)	Case No. 19-cv-00415-RJN
v.)	
)	
IAN CONNORS, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANTS' MOTION FOR EXTENSION
OF TIME, NUNC PRO TUNC, TO FILE ANSWER**

Defendants respectfully move for an extension, nunc pro tunc, of the deadline to file their answer in this case. Defendants' answer was due on November 5, 2021, and Defendants seek an extension until December 3, 2021.

Good cause supports this motion. The deadline for Defendants' answer was triggered on October 22, 2021, when the Court denied Defendants' motion to dismiss. On that day and in the days that followed, Defendants' counsel were focused on reviewing voluminous documents to respond to Plaintiff's expedited discovery requests. Shortly thereafter, the two primary Department of Justice attorneys assigned to this case temporarily transitioned off of it – one to begin a detail on October 27 and the other to begin paternity leave on or about November 2. New DOJ attorneys have been assigned to this matter in the interim, but during the staffing transition, the answer deadline was missed. Defendants regret any inconvenience caused by the inadvertent failure to meet the deadline.

Defendants' counsel require additional time to prepare the answer. Plaintiff's Second Amended Complaint is lengthy, and it will take significant time to respond to the 115 paragraphs of allegations contained therein. Moreover, Defendants' counsel are currently preparing for the

preliminary injunction hearing in this matter scheduled for November 22, and are also busy working on several other active litigation matters with approaching deadlines. Work permitting, counsel might also take annual leave around the Thanksgiving holiday.

Accordingly, Defendants respectfully request that the Court extend the deadline for Defendants' answer until December 3, 2021.

Dated: November 17, 2021

Respectfully submitted,

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