

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

CRISTINA NICHOLE IGLESIAS
(a.k.a. CRISTIAN NOEL IGLESIAS),

Plaintiff,

v.

IAN CONNORS, *et al.*,

Defendants.

Case No. 19-cv-00415-NJR

**DEFENDANTS' CONSENT MOTION FOR 48-HOUR EXTENSION TO
SUBMIT SUPPLEMENTAL RESPONSE TO THE COURT'S
FEBRUARY 21, 2022 ORDER**

Defendants respectfully request a brief 48-hour extension of time to submit their supplemental response to the Court's February 21, 2022 Order, Doc. 198, thereby extending the deadline to 5:00 p.m. on Friday, March 4, 2022. Undersigned counsel for Defendants conferred with counsel for Plaintiff, who indicated that they consent to the requested extension.

1. This Court previously entered a Notice and Order dated February 21, 2022, directing Defendants' counsel to address certain issues in writing by 8 a.m. on February 22, 2022. *See* Doc. 198 at 26. That filing was due in advance of a show cause hearing with the parties scheduled for 9 a.m. on February 22, 2022. *See id.* at 2; *see also* Doc. 187 at 6. Defendants timely filed a written response prior to 8 a.m. on February 22. *See* Doc. 199.

2. At the hearing on February 22, the Court permitted Defendants an opportunity to supplement their prior written response, requiring that any supplemental response be filed by 5:00 p.m. on Wednesday, March 2, 2022. *See* Doc. 200 at 1. Defendants appreciate the chance to make this supplemental response.

3. Additionally, the Court directed that Defendants shall “file a brief as to the procurement process, bids (if any are required), what a contract allows third parties to do or not to do, and any other information relevant to Ms. Iglesias’s request for surgery and related medical treatment to the Court by 5:00 p.m. on Wednesday, March 2, 2022.” *Id.* at 1-2. Finally, the Court directed Defendants to “file weekly updates on contacts with the surgeon, the surgeon’s response, and any other items relating to Ms. Iglesias’s care on Friday, February 25, 2022, by 5:00 p.m., and every Friday thereafter by 5 p.m. until further notice.” *Id.* at 2.

4. Defendants respectfully request a brief, 48-hour extension only with respect to their supplemental response to the Court’s February 21, 2022 Order, which if granted would make that supplemental filing due by 5 p.m. on Friday, March 4—*i.e.*, the same time as that week’s status report. This requested extension does not apply to Defendants’ procurement-related filing, which Defendants still would file by 5 p.m. on Wednesday, March 2.

5. Defendants respectfully suggest that this requested extension for the supplemental response is warranted for two reasons. First, Defendants and their counsel are actively working on this matter, including the procurement-related filing due on March 2, as well as compiling and producing to Plaintiff’s counsel certain documents that they have requested following the Court’s hearing on February 22. This short extension would allow Defendants and their counsel to focus first on those tasks. Second, undersigned counsel—both Mr. Schwei and Mr. Gilligan—have previously planned unavailability, which prevents them from devoting their full attention to the supplemental response prior to the current deadline of Wednesday, March 2.

6. Accordingly, Defendants respectfully request a brief extension of time until 5 p.m. on Friday, March 4. As noted, Defendants appreciate the opportunity to file this supplemental response. In the event the Court concludes that the requested extension is not warranted or would be disruptive to the Court, Defendants will meet the existing deadline.

7. Undersigned counsel reached out to Plaintiff's counsel regarding the requested extension, and Plaintiff's counsel stated that they consent to the requested extension.

Dated: February 28, 2022

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Respectfully submitted,

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/s/ Daniel Schwei

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