

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

CHARLES GOLBERT, COOK COUNTY PUBLIC)	
GUARDIAN, ET AL.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 23-300
)	
MARC D. SMITH, ET AL.,)	Judge Martha M. Pacold
)	
Defendants.)	

**DEFENDANTS' UNOPPOSED MOTION FOR
LEAVE TO FILE OVERSIZED BRIEF INSTANTER**

NOW COME the Defendants, Marc D. Smith, Debra Dyer-Webster, Beverly J. Walker, Lauren Williams, Ryan Goodwin, Antwan Turpeau, Janet Wukas Ahern, Jacquelin Dortch, Keith Polan, Ashley Deckert, Sari Rowitz, Karen Austin-Antoine, and the Illinois Department of Children and Family Services, by their attorney, Kwame Raoul, Attorney General for the State of Illinois, and move this Court for leave to file *instante* the attached oversized brief in support of Defendants' Motion to Dismiss and Motion to Strike Class Allegations. In support, Defendants State as follows:

1. Plaintiffs filed a 32-page Complaint alleging counts under the Constitution, the Rehabilitation Act, and the Americans with Disabilities Act. They purport to bring these claims on behalf of a class and a sub-class.
2. Given the breadth and complexity of Plaintiffs' purported claims, Defendants require additional pages. An oversized brief is necessary to describe the multiple bases on which Plaintiffs' constitutional claims fail; the multiple bases on which their statutory claims fail; and the reasons why their class allegations should be stricken.

3. Defendants respectfully seek leave to file an oversized brief of 20 pages.

Defendants have worked diligently to present their arguments as succinctly as possible while still providing the Court with a thorough explanation of Defendants' bases for their motions.

4. Defendants' counsel conferred with counsel for Plaintiffs prior to filing this motion, and Plaintiffs do not oppose this request for relief.

WHEREFORE, Defendants respectfully request that this Court grant leave to file the attached oversized brief, *instante*.

Dated: June 1, 2023
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Respectfully submitted,
KWAME RAOUL
Illinois Attorney General

By: s/Barbara L. Greenspan
Barbara L. Greenspan

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that, on June 1, 2023, she caused to be filed through the Court's CM/ECF system a copy of Defendants' Motion to File Oversized Brief. Parties of record may obtain a copy of this filing through the Court's CM/ECF system.

/s/ Barbara L. Greenspan

Barbara L. Greenspan