

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

PATRICK QUINN, IRENE ROBINSON,
ANTWAIN MILLER, MARC KAPLAN,
CHRISTOPHER BALL, DANIEL
MORALES-DOYLE, AND JITU BROWN

Plaintiffs,

v.

BOARD OF EDUCATION OF THE CITY OF
CHICAGO; JAMES MEEKS, STEVEN
GILFORD, MELINDA LABARRE, CURT
BRADSHAW, LULA FORD, CRAIG
LINDVAHL, ELIGIO CERDA PIMENTEL,
CESILIE PRICE, AND JOHN SANDERS,
MEMBERS TO THE ILLINOIS STATE
BOARD OF EDUCATION, IN THEIR
OFFICIAL CAPACITIES, AND STATE OF
ILLINOIS

Defendants.

Case No. 2016-cv- 9514

Judge Elaine E. Bucklo

Magistrate Judge Sheila Finnegan

**STATE DEFENDANTS' UNOPPOSED MOTION
FOR LEAVE TO FILE OVERLENGTH BRIEF INSTANTER**

Pursuant to Northern District of Illinois LR 7.1, the members of the Illinois State Board of Education, and the State of Illinois (collectively, the "State Defendants"), by and through their attorney, Lisa Madigan, Illinois Attorney General, move for leave to file a 29-page combined brief in support of their motion to dismiss and in response to Plaintiffs' motion for a preliminary injunction. In support of this motion, the State Defendants state as follows:

1. Per the Court's December 5, 2016 scheduling order, Defendants must file their motion to dismiss the Complaint and their response to the Plaintiffs' motion for a preliminary injunction today, December 19, 2016. Dkt. 32.

2. Plaintiffs' complaint has four separate counts and 132 paragraphs, while Plaintiffs' brief in support of their motion for a preliminary injunction is 25 pages. Dkt. 1, 33. Due to the complexity of the issues raised by the complaint and Plaintiffs' motion for a preliminary injunction, Defendants have prepared a 29-page brief in support of their motion to dismiss and in response to Plaintiffs' motion. Defendants require the additional pages to adequately address the issues raised by the complaint and Plaintiffs' motion.

3. Accordingly, Defendants respectfully request that the Court grant them leave to file a memorandum in excess of the 15-page limit for briefs. Defendants' memorandum was filed concurrently with this motion.

4. Defendants' counsel consulted with Plaintiffs' counsel, Sean Morales-Doyle, on December 19, 2016. Mr. Doyle stated that Plaintiffs have no objection to this motion.

WHEREFORE, Defendants respectfully request that this Court grant their motion to file a 29-page brief in support of their motion to dismiss.

Dated: December 19, 2016

LISA MADIGAN
Attorney General of Illinois
Attorney No. 99000

By: /s/ Sarah H. Newman
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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the foregoing motion was filed through the Court's CM/ECF system on December 19, 2016. Parties of record may obtain a copy through the Court's CM/ECF system. The undersigned certifies that no party of record requires service of documents through any means other than the CM/ECF system.

/s/ Sarah H. Newman