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

PAUL MURPHY et al.,)	
Plaintiffs,)	No. 16 CV 11471
v.)	Judge Virginia M. Kendall
LISAS MADIGAN, et al.,)	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE OVERSIZED BRIEF

The defendants, Lisa Madigan, Attorney General of Illinois, and John R. Baldwin,
Director of the Illinois Department of Corrections ("IDOC"), pursuant to Local Rule 7.1,
respectfully request leave to file a 22-page memorandum in support of their motion to dismiss. In
support of this motion, Defendants state as follows:

- 1. The deadline for Defendants to file their motion to dismiss and supporting memorandum is February 17, 2017. Dkt. 13. Local Rule 7.1 authorizes this Court to grant leave to file memoranda in excess of the 15- page limit set forth in the Rule.
- 2. Though Defendants' counsel attempted to streamline the memorandum as much as possible, due to the complex legal and factual issues in this matter, Defendants require 22 pages in order to fully brief the constitutional issues involved in this case. As one indication of the complexity of the matters presented here, the Complaint presents factual allegations regarding seven different plaintiffs, who are raising five constitutional challenges to various statutes, regulations, and IDOC policies.

- 3. The proposed memorandum is attached to this motion as Exhibit A.
- 4. We have consulted with plaintiffs' counsel and they have indicated they have no objection to this motion.

WHEREFORE, Defendants respectfully request that the Court grant them leave to file the memorandum of law attached hereto in support of Defendants' motion to dismiss the Complaint.

Respectfully submitted,

LISA MADIGAN Attorney General of Illinois

By: /s/ Sarah H. Newman

Thomas A. Ioppolo Sarah H. Newman

Assistant Attorneys General

100 W. Randolph Street, 13th Floor

Chicago, Illinois 60601

312-814-7198 / 312-814-6131

tioppolo@atg.state.il.us snewman@atg.state.il.us

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that the aforementioned document was filed through the Court's CM/ECF system on February 17, 2017. 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