

No. 130539

E-FILED
5/30/2024 2:50 PM
CYNTHIA A. GRANT
SUPREME COURT CLERK

IN THE
SUPREME COURT OF ILLINOIS

PIASA ARMORY, LLC,)	Interlocutory Appeal from the Circuit
)	Court of the Third Judicial Circuit,
Plaintiff-Appellee,)	Madison County, Illinois
)	
v.)	
)	No. 2023-LA-1129
KWAME RAOUL, in his official)	
capacity as Attorney General of the)	
State of Illinois,)	The Honorable
)	RONALD J. FOSTER, JR.,
Defendant-Appellant.)	Judge Presiding.

**MOTION FOR EXTENSION OF TIME TO FILE
DEFENDANT-APPELLANT'S BRIEF**

Defendant-Appellant Kwame Raoul, in his official capacity as Attorney General of Illinois, hereby moves for an extension of time to file his opening brief from June 10, 2024, to and including August 2, 2024. The verification by declaration of Deputy Solicitor General Alex Hemmer is attached in support of this motion.

Respectfully submitted,

KWAME RAOUL
Attorney General
State of Illinois

/s/ Alex Hemmer
ALEX HEMMER
Deputy Solicitor General
115 South LaSalle Street
Chicago, IL 60603
(312) 814-5526 (office)
(773) 590-7932 (cell)
CivilAppeals@ilag.gov (primary)
Alex.Hemmer@ilag.gov (secondary)

VERIFICATION BY CERTIFICATION

I, ALEX HEMMER, state the following:

1. I am a citizen of the United States over the age of 18. My current business address is 115 South LaSalle Street, Chicago, Illinois 60603. I have personal knowledge of the facts set forth in this declaration. If called upon to do so, I could and would competently testify thereto.
2. I serve as Deputy Solicitor General in the Office of the Attorney General of the State of Illinois and have been assigned to represent Defendant-Appellant Kwame Raoul, in his official capacity as Attorney General of Illinois, in this appeal captioned *Piasa Armory, LLC v. Raoul*, No. 130539. I am the only attorney with principal responsibility for this appeal.
3. Defendant-Appellant's opening brief is currently due on June 10, 2024, on no extensions of time.
4. Although I have begun to draft the brief, I will not be able to complete the draft, have the draft reviewed through the Office's regular review process, and file the brief with this Court by June 10, 2024, for several reasons.
5. As Deputy Solicitor General, I devote substantial time to performing supervisory and administrative duties in addition to managing my own caseload. These duties include reviewing briefs, managing the office's amicus docket, reviewing multistate litigation requests, and helping attorneys prepare for oral arguments.
6. In addition to my supervisory and administrative responsibilities, between the filing of the record on appeal and the current deadline of June 10, 2024,

I have been responsible for drafting or reviewing filings in numerous other matters, including a motion for summary judgment in *Ross v. Gossett*, No. 15-cv-0309 (S.D. Ill.), which was filed on May 22, 2024; the opening brief in *Staffing Services of Ill. v. Flanagan*, No. 24-1450 (7th Cir.), which is due on June 19, 2024; an amicus brief in *Nat'l Ass'n of Mutual Insurance Cos. v. U.S. Dep't of Housing & Urban Development*, No. 23-4275 (D.C. Cir.), which is due on July 10, 2024; and an anticipated reply brief in support of summary judgment in *Ross*, which will be due in July 2024.

7. For these reasons, I seek an extension of time from June 10, 2024, to August 2, 2024.

8. I do not request this extension of time from June 10, 2024, to August 2, 2024, to file the brief in this appeal for purposes of delay, but so that I may try to meet my professional responsibilities, properly represent my clients, and provide this Court with a thorough brief in this case.

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

Executed on May 30, 2024.

/s/ Alex Hemmer
ALEX HEMMER

No. 130539

IN THE
SUPREME COURT OF ILLINOIS

PIASA ARMORY, LLC,)	Interlocutory Appeal from the Circuit
)	Court of the Third Judicial Circuit,
Plaintiff-Appellee,)	Madison County, Illinois
)	
v.)	
)	No. 2023-LA-1129
KWAME RAOUL, in his official)	
capacity as Attorney General of the)	
State of Illinois,)	The Honorable
)	RONALD J. FOSTER, JR.,
Defendant-Appellant.)	Judge Presiding.

ORDER

THIS CAUSE COMING TO BE HEARD on the motion of Defendant-Appellant Kwame Raoul, in his official capacity as Attorney General of the State of Illinois, for an extension of time from June 10, 2024, to and including August 2, 2024, to file the opening brief in this case; due notice having been given; and the Court being fully apprised;

IT IS HEREBY ORDERED that the motion is GRANTED/DENIED.

ENTER:

JUSTICE

JUSTICE

JUSTICE

DATED: _____
Alex Hemmer
Deputy Solicitor General
115 South LaSalle Street
Chicago, Illinois 60603

CERTIFICATE OF FILING AND SERVICE

I certify that on May 30, 2024, I electronically filed the foregoing **Motion for Extension of Time** with the Clerk of the Court for the Supreme Court of Illinois by using the Odyssey eFileIL system.

I further certify that the other participants in this appeal, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served via the Odyssey eFileIL System.

Thomas G. Maag
tmaag@maaglaw.com

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

/s/ Alex Hemmer
ALEX HEMMER
Deputy Solicitor General
115 South LaSalle Street
Chicago, IL 60603
(312) 814-5526 (office)
(773) 590-7932 (cell)
CivilAppeals@ilag.gov (primary)
Alex.Hemmer@ilag.gov (secondary)