

**THIS APPEAL INVOLVES A MATTER SUBJECT TO EXPEDITED
DISPOSITION UNDER RULE 604(h)**

No. 131279

**IN THE
SUPREME COURT OF ILLINOIS**

| | | |
|----------------------------------|---|----------------------------------|
| PEOPLE OF THE STATE OF ILLINOIS, |) | Appeal from the Appellate Court |
| |) | of Illinois, Fourth District, |
| Plaintiff-Appellant, |) | No. 4-24-1100 |
| |) | |
| |) | There on Appeal from the Circuit |
| |) | Court of Sangamon County, |
| v. |) | Illinois, |
| |) | No. 2024 CF 909 |
| |) | |
| SEAN P. GRAYSON, |) | The Honorable |
| |) | Ryan Cadagin, |
| Defendant-Appellee. |) | Judge Presiding. |

**UNOPPOSED FIRST MOTION
FOR EXTENSION OF TIME TO FILE APPELLANT'S BRIEF**

Pursuant to Supreme Court Rules 343(c), 361(f), and 610(b) plaintiff-appellant, the People of the State of Illinois, respectfully requests an extension of 14 days, from February 19, 2025, to and including March 5, 2025, to file its opening brief. In support of this unopposed first motion for extension, undersigned counsel states as follows:

1. The People's brief currently is due on February 19, 2024. Despite his diligence, undersigned counsel is unable to complete and file the brief by that deadline. Defendant-appellee's counsel has confirmed that defendant will not object to this request for extension.

2. The record, filed on January 29, 2025, is several hundred pages (counsel's motion for access to the secured record is being filed today). Undersigned counsel was not the attorney who litigated this case for the People in the courts below and, therefore, he needs additional time to review the record and the relevant case law and draft the People's brief. And, once counsel has completed a draft of the brief, it must be reviewed, in accordance with office protocol, by the Chief and a supervisor of the Criminal Appeals Division, as well as the Solicitor General, before filing.

3. In addition, undersigned counsel has had, and will have, substantial responsibilities in a number of other matters, including but not limited to: (i) preparing for oral argument in *People v. Smith*, No. 130067 (Illinois Supreme Court), anticipated to be in March 2025; (ii) preparing for oral argument in *People v. Wallace*, No. 130067 (Illinois Supreme Court), anticipated to be in March 2025; (iii) drafting respondent's answer in *Railey v. Crow*, No. 24-1364-JES (C.D. Ill.), due (with one extension) on February 18, 2025; (iv) drafting respondent's reply in *Amaya v. Jones*, No. 24 C 3828 (N.D. Ill.), due February 21, 2025; and (v) litigating other cases in the federal courts.

4. This case concerns pretrial detention. The circuit court ordered that defendant be detained pending trial on July 18, 2024. The Illinois Appellate Court reversed that order in a decision issued on November 27, 2024. This Court granted the People leave to appeal that judgment on January 29, 2025.

5. This is the People's first request for an extension of time to file their opening brief. The People's request for an extension is made in good faith and not for the purpose of mere delay. The undersigned regrets any inconvenience that this request may cause.

WHEREFORE, the People of the State of Illinois respectfully requests an extension of 14 days, to and including March 5, 2025, to file its opening brief.

February 3, 2025

Respectfully submitted,

KWAME RAOUL
Attorney General of Illinois

/s/ Michael L. Cebula
MICHAEL CEBULA
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VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

/s/ Michael L. Cebula
MICHAEL L. CEBULA
Assistant Attorney General

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| SEAN P. GRAYSON, |) | The Honorable |
| |) | Ryan Cadagin, |
| Defendant-Appellee. |) | Judge Presiding. |

ORDER

This matter coming to be heard on the Unopposed First Motion for Extension of Time to File the People's Appellant's Brief until March 5, 2025, the motion is hereby GRANTED/DENIED.

DATED: _____

JUSTICE

MICHAEL CEBULA
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PROOF OF FILING AND SERVICE

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On February 3, 2025, the foregoing motion was filed with the Clerk of the Supreme Court of Illinois, using the court's electronic filing system, which provided notice to the following registered email address:

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Counsel for Defendant-Appellee

/s/ Michael L. Cebula

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