

No. 130539

E-FILED  
10/8/2024 11:46 AM  
CYNTHIA A. GRANT  
SUPREME COURT CLERKIN 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 REPLY BRIEF**

Defendant-Appellant Kwame Raoul, in his official capacity as Attorney General of Illinois, hereby moves for a three-week extension of time to file his reply brief, from October 21, 2024, to and including November 11, 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)

130539

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 reply brief is currently due on October 21, 2024, on no extensions of time.

4. 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 October 21, 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 today and the current deadline of October 21, 2024, I have been responsible

for drafting or reviewing filings in numerous other matters, including an amicus brief in *Property Casualty Insurers Ass'n of America*, No. 24-1947 (7th Cir.), which is due on October 17, 2024; a brief in opposition in *Martin v. Haling*, No. 23-1269 (U.S.), which is due on October 18, 2024; and an amicus brief in *Becerra v. Braidwood Management*, No. 24-316 (U.S.), which is due on October 21, 2024.

7. For these reasons, I seek an extension of time from October 21, 2024, to November 11, 2024.

8. I do not request this extension of time from October 21, 2024, to November 11, 2024, to file the reply 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 October 8, 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 October 21, 2024, to November 11, 2024, to file the reply 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 October 8, 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)