

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

BRIDGET BITTMAN,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No.: 1:14-cv-8191
)	
MEGAN FOX, an individual; KEVIN)	Judge James F. Holderman
DUJAN, an individual; DAN KLEINMAN, an)	
individual; ADAM ANDRZEJEWSKI, an)	
individual; and FOR THE GOOD OF)	
ILLINOIS, an Illinois Not for Profit)	
Organization,)	
)	
Defendants.)	

**FOR THE GOOD OF ILLINOIS DEFENDANTS’ MOTION FOR EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendants Adam Andrzejewski and For the Good of Illinois (the “For the Good of Illinois Defendants”), by and through their attorneys, the Thomas More Society, hereby move for a brief extension of time in which to Answer or to otherwise plead, and state in support as follows:

1. Plaintiff filed her Complaint on October 20, 2014, and mailed a Waiver of Service packet to the For the Good of Illinois Defendants on October 27, 2014.
2. The For the Good of Illinois Defendants engaged the Thomas More Society, a public interest law firm, which has agreed to defend them *pro bono* against this lawsuit.
3. The For the Good of Illinois Defendants began to prepare their response to the Complaint but, on December 18, 2014, Plaintiff withdrew her Complaint, asking for leave to amend.
4. Plaintiff’s Amended Complaint was finally filed on January 21, 2015.

5. Peter Breen, lead counsel on this case, was sworn in to the Illinois House of Representatives on January 14, 2015. The House is currently in session; as a result, Mr. Breen is spending several days each week serving the State of Illinois. This has prohibited him from completing the large amount of work needed for the responsive filing to this Amended Complaint, which contains 380 paragraphs.

6. Moreover, Counsel is currently attempting to edit the Motion so that it complies with this Court's requirements of being 15 pages or fewer. Given the multiple avenues of relief the For the Good Defendants will be seeking, meeting this page limit will require a vast amount of editing for conciseness and may not be possible.

7. The Complaint alleges two sets of claims: 1) federal claims against Defendants Fox and DuJan, based on a Facebook page that is an alleged spoof of the Plaintiff's private flower arrangement business, and 2) Illinois state defamation and related claims against all Defendants, based on alleged publications and actions directly stemming from Plaintiff's role as lead public spokesperson for the Orland Park Library District. There is no diversity jurisdiction, as Plaintiff and all but one of the Defendants are Illinois residents. On their face, the Illinois state claims do not appear to be within the supplemental jurisdiction of this Court.

8. The Illinois state claims also implicate the Illinois Citizen Participation Act, which provides a defense in suits alleging defamation and similar claims against defendants involved in petitioning government and the electorate, and other core First Amendment activity. The scope and impact of the Citizen Participation Act is the subject of significant litigation in Illinois state courts. And, the effect of the Act – which halts discovery and has other effects that may be construed to be procedural in nature – on federal litigation of Illinois tort claims is unsettled.

9. In light of the legal complexities raised by the Amended Complaint and in order to ensure a thorough but concise responsive pleading, the For the Good of Illinois Defendants seek a brief extension of 21 days, until March 12, 2015, to file their responsive pleading to the Complaint.

WHEREFORE, Defendants Adam Andrzejewski and For the Good of Illinois move that they be granted a brief extension of 21 days, until March 12, 2015, in which to Answer or otherwise plead to the Amended Complaint and for all other relief to which they may be justly entitled on the premises.

Respectfully submitted,

/s/ Corrina Konczal
*One of the Attorneys for Adam Andrzejewski
and For the Good of Illinois*

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