## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, CHANCERY DIVISION

JOHN KRAFT,	)	
	)	
Plaintiff,	)	
VS.	)	CASE NO. 2022-CH-11352
VILLAGE OF DOLTON,	)	
	)	
Defendant.	)	

## AMENDED MOTION FOR EXTENSION OF TIME/MOTION TO WITHDRAW PURSUANT TO ILLINOIS SUPREME COURT RULE 13

Now comes Del Galdo Law Group, LLC, and hereby present its amended motion for an extension of time/motion to withdraw as counsels for VILLAGE OF DOLTON (the "Village"), in support thereof state as follows:

- 1. Counsel Cynthia S. Grandfield of Del Galdo Law Group, LLC, filed an appearance on behalf of Defendants the Village, Ofc. Lacey and Ofc. Staples on February 23, 2023;
- 2. Del Galdo Law Group, LLC wishes to withdraw as counsels of record for the Village Defendants where continued representation would result in an unreasonable financial burden on Del Galdo Law Group, LLC and its attorneys within the meaning of Illinois Supreme Court Rule 1.16(a)(6);
- 3. Notification pursuant to Illinois Supreme Court Rule 13(c)(2) has/will be provided;
- 4. Defendants Village of Dolton (attn: Alison Key, Clerk), may be reached at Mailing Address: 14122 Martin Luther King Jr. Drive, Dolton, IL 60419, Phone number: 708-849-4000; and
- 5. This motion was filed without undue delay.
- 6. As Defendants still must file their answer to this action, counsel requests that they be provided additional time to do so.

Wherefore, for the reasons stated herein, Del Galdo Law Group, LLC respectfully request this court enter an order granting its motion to withdraw as attorneys for the Village Defendants, granting them additional time to file their answer, and for such other relief this court deems just and equitable.

Respectfully Submitted,

Del Galdo Law Group, LLC

/s/Alisha N. Chambers
Alisha N. Chambers

Alisha N. Chambers Del Galdo Law Group, LLC (#44047) 1441 S. Harlem Ave. Berwyn, Illinois 60402 (708)222-7000/ (708)222-2001 Fax chambers@dlglawgroup.com