

10452-155
RRB/ms

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION

NICHOLAS BANNING,)	
)	
Plaintiff,)	
)	
v.)	No. 21-cv-03100-JES-JEH
)	
SHELBY COUNTY, SHELBY COUNTY SHERIFF)	
BRIAN MCREYNOLDS, DON KOONCE,)	
ADVANCED CORRECTIONAL HEALTHCARE,)	
INC., CWENTON WILLIAMS, TONYA)	
ATTEBERRY, DEVON DURBIN, MEGAN)	
WARNER, MELISSA HAYNES, BRANDON)	
GATTON, CHRIS ZAKOWSKI, DAINE)	
BURKHEAD,)	
)	
Defendants.)	

JOINT MOTION FOR EXTENSION OF DISPOSITIVE MOTION DEADLINE

The parties Plaintiff and the Shelby County Defendants, by and through their attorneys, jointly file the foregoing Motion for Extension of Dispositive Motion Deadline, and in support thereof state as follows:

1. Dispositive motions are currently due February 24, 2025. (Text Order entered January 17, 2025.)
2. Plaintiff intends to file partial summary judgment motions against the Shelby County Defendants and the ACH Defendants.
3. The Defendants intend to file motions for summary judgment on Plaintiff's claims.
4. Plaintiff's counsel has conferred with counsel for the Shelby County Defendants and a settlement has been reach in principle pending final authorization in Mid-March 2025.

5. The Plaintiff and the Shelby County Defendants jointly desire to extend the deadline for dispositive motions to March 24, 2025, with the mutual understanding that a formal settlement and Motion to Dismiss will be file with the Court before that time.

6. The Plaintiff and the Shelby County Defendants are jointly filing this Motion in acknowledgment of judicial efficiency and to avoid the unnecessary expenditure of resources given that settlement is imminent.

7. This request is not being made to unnecessarily delay the case and is agreed to by the parties.

WHEREFORE, the parties respectfully request that this Honorable Court extend the dispositive motion to deadline to March 24, 2025.

Respectfully submitted,

Nicholas Banning, Plaintiff

By: /s/ Daniel P. Kiss
Daniel P. Kiss
Meyer & Kiss, LLC

Shelby County, Shelby County Sheriff Brian McReynolds, Don Koonce, Cwenton Williams, Tonya Atteberry, Devon Durbin, Brandon Gatton, Daine Burkhead, Melissa Haynes, Megan Warner And Chris Zakowski, Defendants

By: /s/ Ryan R. Bradley
Ryan R. Bradley
Heyl Royster Voelker & Allen

PROOF OF SERVICE

I hereby certify that on February 25, 2025, I electronically filed the foregoing **Joint Motion for Extension of Dispositive Motion Deadline**, with the Clerk of the Court using the CM/ECF system, which will send notification to:

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s/ Ryan R. Bradley _____
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