IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY DEPARTMENT, LAW DIVISION

KYANA KING,)
Plaintiff,)
VS.) Case No. 2021L011895
TARGET CORPORATION, TARGET STORES and SUPER TARGET,)
Defendants)

DEFENDANTS' AGREED MOTION FOR AN EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

NOW COME the Defendants, TARGET CORPORATION, TARGET STORES and SUPER TARGET, by and through their attorneys, Eileen M. Letts and Brian J. Beck of ZUBER LAWLER LLP, and move this Honorable Court for entry of an Order allowing additional time to answer or otherwise plead to Plaintiff's Complaint and in support thereof, state as follows:

- 1. On March 2, 2022, a Case Management Order was agreed upon and entered by the parties.
- 2. Subsequently, on March 3, 2022, the Defendants counsel entered an Agreed Protective Order discussing a confidentiality agreement.
- 3. Plaintiff is scheduled to be on trial next week, and the Defendants want to discuss the incident video that can affect their response to Plaintiff's Complaint.
- 4. Accordingly, Defendants conferred with Plaintiff seeking an additional thirty (14) days to answer or otherwise plead to Plaintiff's complaint, including April 20, 2022, to which Plaintiff agreed.

WHEREFORE, for the foregoing reasons, Defendants, TARGET CORPORATION,
TARGET STORES and SUPER TARGET, request this Honorable Court enter an order

granting this instant Motion and extending the time to answer or otherwise respond in this matter up to and including April 20, 2022.

Respectfully submitted,

TARGET CORPORATION, TARGET STORES and SUPER TARGET

By: s/ Eileen M. Letts

One of Their Attorneys

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