

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

NIKLAS HUNDER,)	
)	
Plaintiff,)	
)	
v.)	Case No. 2024CH09985
)	
CHICAGO TRANSIT AUTHORITY,)	
)	
Defendant.)	

**MOTION TO EXTEND TIME FOR FILING OF PLAINTIFFS RESPONSE TO
DEFENDANTS MOTION TO DISMISS AND DEFENDANT’S REPLY**

I. INTRODUCTION

The Court should grant Plaintiff’s Motion to Extend Time for Filing of a Response by seven calendar days until May 7th, 2025 and for an extension of Defendant’s time to file its Reply to May 30th, 2025. Earlier this month, Plaintiff and Defendant began negotiating settlement terms for this case. Since the initial offer put forth by Plaintiff, Defendant and Plaintiff have exchanged multiple offers with each other. Each subsequent offer has increased the likelihood the case may be resolved outside of the court.

II. RECENT EVENTS

To give both parties adequate time to consider and respond to each other’s offers, Plaintiff is seeking a 7-calendar day extension for both parties’ upcoming deadlines. Such approval would avoid causing Plaintiff to make his filing on April 30th, 2025 and also avoid causing Defendant to continue attempting to reach a settlement while also preparing a Reply to Plaintiff’s Response while preserving the original amount of time requested by Defendant’s counsel.

III. CONCLUSION

It is expected that approval of this Motion would benefit both parties to the case and may relieve the Judiciary from having to further facilitate the case as a settlement may be reached in the case by May 7th, 2025. Accordingly, the Court should approve the motion.

Dated: April 28, 2025

RESPECTFULLY SUBMITTED,

/s/ Niklas Hunder

Niklas Hunder
Policy Analyst/Researcher

Exhibit A