

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

NIKLAS HUNDER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	2024CH05867
	)	
CHICAGO TRANSIT AUTHORITY,	)	
	)	
Defendant.	)	

**MOTION TO ENTER DEFAULT JUDGEMENT ON ALL COUNTS  
PURSUANT TO ILLINOIS SUPREME COURT RULE 181(a)**

**I. SUMMARY**

The Court should grant Plaintiff's motion to enter a default judgement proceeding against Defendant, CHICAGO TRANSIT AUTHORITY pursuant to 735 ILCS 5/2-1301 for its failure to file an answer within 30 days of receiving Summons or by an extension granted by a Motion as required by Illinois Supreme Court Rule 181(a).

**II. THE COURT SHOULD GRANT PLAINTIFF'S MOTION**

As specified in 735 ILCS 5/2-601 "The first pleading by the defendant shall be designated an answer." And as required by Illinois Supreme Court Rule 181(a), Defendant had 30 days to file with the Court and notify Plaintiff of its filing of an Answer. Defendant was successfully served by a Cook County Sheriff on November 4<sup>th</sup>, 2024. As agreed to by Plaintiff and Defendant, the court issued an Order on December 9<sup>th</sup>, 2024 granting Defendant until January 23<sup>rd</sup>, 2025, to Answer or otherwise plead to Plaintiff's Complaint, a 45-day extension.

With Defendant's failure to make the appropriate filing after 75 days, the Court should enter a default judgment based on Defendant's failure to file an Answer and not informing the Court on its pleadings against Defendant and grant all relief as detailed in the Complaint.

Dated: January 24, 2025

RESPECTFULLY SUBMITTED,

/s/ Niklas Hunder

Niklas Hunder  
Policy Analyst/Researcher