

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
FORT WAYNE DIVISION

BALIN BRAKE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 1:20-cv-345-HAB-SLC
	)	
CITY OF FORT WAYNE,	)	
JUSTIN HOLMES, in his official	)	
and individual capacity,	)	
	)	
Defendants.	)	

SECOND JOINT MOTION FOR EXTENSION OF TIME

The Parties, by and through counsel, submit this joint motion for a second extension of time within which to file a stipulation of dismissal in this matter. The Parties jointly state:

1. On January 15, 2022, mediator Erik Chickedantz notified the Court that the parties had reached an agreed resolution of this matter. (Dkt. 50).
2. The Court then issued its order requiring the parties to file dismissal papers on or before February 22, 2022. (Dkt. 51).
3. On February 17, 2022, the Parties filed their first Joint Motion for Extension of Time (Dkt. 52), which was granted extending the deadline to file dismissal papers on or before March 22, 2022. (Dkt. 53).
4. On March 21, 2022, the parties finalized the terms of the settlement agreement and therefore seek an additional 30-day extension of time to obtain signatures and file appropriate dismissal documents.

Wherefore, the parties jointly request that this Court grant an extension of time, through and including April 21, 2022 to file a stipulation of dismissal in this matter.

/s/ Katie Sreenan

Kara McCall
Daniel Neppi*
Katie Sreenan*
SIDLEY AUSTIN LLP
1 S. Dearborn Street
Chicago, IL 60603
Telephone: +1 312 853 7000
Facsimile: +1 312 853 7036

Stevie J. Pactor
Kenneth J. Falk
Gavin M. Rose
ACLU of Indiana
1031 E. Washington St.
Indianapolis, IN 46202
Telephone: +1 317 635 4105
Fax: +1 317 635 4105
spactor@aclu-in.org
kfalk@aclu-in.org
grose@aclu-in.org

Attorneys for Plaintiff

**Admitted pro hac vice*

s/ Anne L. Cowgur (w/consent)

Anne L. Cowgur
TAFT STETTINIUS & HOLLISTER LLP
One Indiana Square, Suite 3500
Indianapolis, IN 46204
Telephone: +1 317 713 3500
Fax: +1 317 713 3699
acowgur@taftlaw.com

Adam M. Henry
Theodore T. Storer
BEERS MALLERS BACKS & SALIN LLP
110 West Berry Street, Suite 1100
Fort Wayne, IN 46802
Telephone: +1 260 426 9706
Fax: +1 260 420 1314
amhenry@beersmallers.com
ttstorer@beersmallers.com

Carol Tan Helton
CITY OF FORT WAYNE
1 Citizens Square
200 East Berry Street, Suite 430
Fort Wayne, IN 46802
Telephone: +1 260 427 1395
carol.helton@cityoffortwayne.org

Attorneys for Defendants