

No. 4-22-0622

IN THE  
APPELLATE COURT OF ILLINOIS  
FOURTH JUDICIAL DISTRICT

STATE OF ILLINOIS <i>ex rel.</i>	)	On Appeal from the Circuit Court
EMILY FOX,	)	for the Seventh Judicial Circuit,
Relator-Appellant,	)	Sangamon County, Illinois
v.	)	
JENNY THORNLEY,	)	No. 2021 L 0053
Defendant,	)	
and	)	
THE STATE OF ILLINOIS,	)	HONORABLE ADAM JIGANTI,
Appellee.	)	Judge Presiding.

**Unopposed Motion for Extension of Time to File Appellee's Brief**

Appellee the State of Illinois, by its counsel, Illinois Attorney General Kwame Raoul, respectfully moves, without opposition by the appellant, for a five-week extension, to March 14, 2023, to file its brief, and in support of this motion submits the verified declaration of Assistant Attorney General Richard S. Huszagh.

January 30, 2023

Respectfully submitted,

/s/ Richard S. Huszagh

RICHARD S. HUSZAGH  
Assistant Attorney General  
ARDC No. [REDACTED]

100 West Randolph St., 12th Floor  
Chicago, Illinois 60601  
(312) 814-2587 (office)  
(773) 590-7076 (cell)

CivilAppeals@ilag.gov (primary)  
Richard.Huszagh@ilag.gov (secondary)

KWAME RAOUL  
Attorney General  
State of Illinois

JANE ELINOR NOTZ  
Solicitor General  
100 W. Randolph St., 12th Floor  
Chicago, Illinois 60601

### **Verified Declaration of Richard S. Huszagh**

1. I am an Assistant Attorney General in the Civil Appeals Division of the Illinois Attorney General's Office and am the attorney assigned to represent appellee, the State of Illinois (the "State") in this appeal. This appeal was recently reassigned to me, and I filed my Substitute Appearance on January 19, 2023.

2. Since this appeal was reassigned to me, I have worked diligently on preparing the State's brief. However, in light of the legal and factual issues raised by this appeal, it is not realistically practical for me to complete the State's brief by the current deadline on February 7, 2023.

3. On January 30, 2023, I communicated with Diana Guler, one of the attorneys for the appellant, Emily Fox, who indicated that appellant does not oppose this request for an extension of time for the State to file its brief.

I declare under penalty of law as provided in 735 ILCS 5/1-109 that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

January 30, 2023

/s/ Richard S. Huszagh

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Appellee.	)	Judge Presiding.

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**ORDER**

This matter having come before the Court on the unopposed Motion of Appellee the State of Illinois for a five-week extension, to March 14, 2023, to file its brief,

It is hereby Ordered that this motion is GRANTED / DENIED.

Date: \_\_\_\_\_

\_\_\_\_\_  
Justice

## Certificate of Filing and Service

On January 30, 2023, I electronically filed this Unopposed Motion for Extension of Time to File Appellee's Brief with the Clerk of the Court for the Illinois Appellate Court, Fourth Judicial District, by using the Odyssey eFile IL system.

Counsel for the other participant in this action, listed below, are registered service contacts on the Odyssey eFileIL system and will be served via that system.

Robert M. Andalman      randalman@aandglaw.com

Diana Guler              dguler@aandglaw.com

Under penalties as provided by law pursuant to section 1-109 of the Illinois Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct to the best of my knowledge, information, and belief.

/s/ Richard S. Huszagh  
RICHARD S. HUSZAGH  
Assistant Attorney General  
100 West Randolph Street  
12th Floor  
Chicago, Illinois 60601  
(312) 814-2587  
(773) 590-7076 (cell)  
Primary e-service:  
CivilAppeals@ilag.gov  
Secondary e-service:  
richard.huszagh@ilag.gov