

No. 4-22-0622

IN THE  
APPELLATE COURT OF ILLINOIS  
FOURTH JUDICIAL DISTRICT

---

STATE OF ILLINOIS <i>ex rel.</i> EMILY	)	Appeal from the Circuit Court of
FOX,	)	Sangamon County, Illinois
	)	
Relator-Appellant,	)	
	)	
v.	)	
	)	
JENNY THORNLEY,	)	No. 2021 L 000053
	)	
Defendant,	)	
	)	
and	)	
	)	
THE STATE OF ILLINOIS,	)	The Honorable
	)	ADAM GIGANTI,
Appellee.	)	Judge Presiding.

---

**APPELLEE STATE OF ILLINOIS' UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE BRIEF**

Appellee State of Illinois moves this court unopposed for a 35-day extension of time to file its response brief from November 29, 2022, to and including January 3,

2023. The attached verification by certification supports this motion.

Respectfully submitted,

KWAME RAOUL  
Attorney General  
State of Illinois

By: /s/ Christopher M. R. Turner  
CHRISTOPHER M. R. TURNER  
Assistant Attorney General  
ARDC No. [REDACTED]  
100 West Randolph Street  
12th Floor  
Chicago, Illinois 60601  
(312) 814-2106 (office)  
(773) 590-7121 (cell)  
CivilAppeals@ilag.gov (primary)  
Christopher.Turner@ilag.gov (secondary)

## VERIFICATION BY CERTIFICATION

I, Christopher M. R. Turner, state the following:

1. I am a citizen of the United States over the age of 18. My current business address is 100 West Randolph Street, 12th Floor, Chicago, Illinois 60601. I have personal knowledge of the facts set forth in this verification by certification. If called upon, I could competently testify to these facts.

2. I am an Assistant Attorney General in the Civil Appeals Division of the Office of the Attorney General of the State of Illinois, representing Appellee State of Illinois (“State”), in this appeal, and am the only attorney assigned to do so.

3. This is the State’s first motion for an extension of time to file this brief. Relator-Appellant, Emily Fox, filed her opening brief on October 25, 2022. Accordingly, the State’s response brief currently is due November 29, 2022.

5. I have contacted counsel for Relator-Appellant Emily Fox, Diana Guler, who represented that the Appellant does not oppose this motion.

6. I will be unable to complete a draft of the response brief, have it reviewed through the regular review process of the Civil Appeals Division, finalize it, and file it with this Court by its due date for the following reasons.

- a. On October 26, 2022, I presented oral argument on behalf of Defendants-Appellees in *Courtney v. Butler* (Seventh Circuit Court of Appeals, No. 21-2697). This appeal addresses the dismissal of a former prisoner’s action alleging that defendants violated his rights under the Fourteenth and Eighth Amendments to the Constitution by detaining him during his mandatory supervised release for failing to locate a suitable residential host site. Prior to argument, I prepared over several days.
- b. On October 28, 2022, I filed the reply brief of Defendant-Appellant Illinois State Treasurer Michael W. Frerichs in *Rios v. Frerichs* (Illinois

Appellate Court, First Judicial District, No. 1-21-1285), on a final extension of time. This appeal addresses the Treasurer's appeal of a circuit court order directing the Treasurer to turn over funds that the Treasurer allegedly held for plaintiff under the Illinois Unclaimed Property Act, 765 ILCS 1025/1 *et seq.* (2020). Because it was due on a final extension of time, this brief was my top work priority.

- c. On December 7, 2022, I am scheduled to file on a final extension of time the response brief on behalf of Defendants-Appellees Timothy C. Evans, Chief Judge of the Circuit Court of Cook County, and Sanjay T. Tailor, Presiding Judge of the County Division of the Circuit Court of Cook County, in *Reyna Angelina Ortiz v. Kimberly M. Foxx* (Seventh Circuit Court of Appeals, No. 22-1735). This appeal involves the dismissal of plaintiffs' claims alleging that provisions of the Name Change Statute, 735 ILCS 5/21-101 *et seq.* (2020), violate the First and Fourteenth Amendments of United States Constitution. Because it is due on a final extension of time, this brief is now my top work priority.
- d. On December 7, 2022, I am scheduled to file the brief of Respondent-Appellee Illinois Property Tax Appeal Board in *Shawnee Community Unit School District No. 84 v. Illinois Property Tax Appeal Board* (Illinois Supreme Court, No. 128731). This direct administrative review action addresses a challenge to the Board's final administrative decision reducing property tax assessments of a natural gas-fired power plant in Jackson County, Illinois. I intend to seek an extension of time to file this brief and, because it is due to be filed in the Illinois Supreme Court, plan to give this brief priority in my schedule after I file the *Ortiz* brief.
- e. In addition, since I filed the *Rios* brief, I have devoted significant time to performing various supervisory and administrative duties in my capacity as a Supervising Attorney, including reviewing a brief to be filed in this court, conducting conference calls on issues arising in appeals that I am supervising, analyzing and conferring with trial and appellate counsel to determine whether to seek appeals in other litigation matters, and reviewing multiple procedural motions.

7. This request for an extension is made with regard for this court's deadlines and not to unnecessarily delay this action. Instead, I seek to present a thorough brief and to meet my professional responsibilities in a careful and orderly manner.

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.

Executed on November 15, 2022.

/s/ Christopher M. R. Turner  
CHRISTOPHER M. R. TURNER  
Assistant Attorney General  
ARDC No. [REDACTED]  
100 West Randolph Street  
12th Floor  
Chicago, Illinois 60601  
(312) 814-2106 (office)  
(773) 590-7121 (cell)  
CivilAppeals@ilag.gov (primary)  
Christopher.Turner@ilag.gov (secondary)

No. 4-22-0622

IN THE  
APPELLATE COURT OF ILLINOIS  
FOURTH JUDICIAL DISTRICT

STATE OF ILLINOIS <i>ex rel.</i> EMILY	)	Appeal from the Circuit Court of
FOX,	)	Sangamon County, Illinois
	)	
Relator-Appellant,	)	
	)	
v.	)	
	)	
JENNY THORNLEY,	)	No. 2021 L 000053
	)	
Defendant,	)	
	)	
and	)	
	)	
THE STATE OF ILLINOIS,	)	The Honorable
	)	ADAM GIGANTI,
Appellee.	)	Judge Presiding.

**ORDER**

This matter coming to be heard on the unopposed motion of Appellee, the State of Illinois, for a 35-day extension of time to file its response brief, from November 29, 2022, to and including January 3, 2023, due notice having been given, and the Court being advised in the premises;

IT IS HEREBY ORDERED that the motion is GRANTED / DENIED.

Appellee’s response brief is due to be filed on January 3, 2023.

ENTERED: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_  
DATE

Christopher M. R. Turner  
Assistant Attorney General  
Civil Appeals Division

## CERTIFICATE OF FILING AND SERVICE

I certify that on November 15, 2022, I electronically filed the foregoing **Appellee State of Illinois' Unopposed Motion For Extension of Time To File Brief** with the Clerk of the Court for the Illinois Appellate Court, Fourth Judicial District, by using the Odyssey eFileIL system.

I further certify that the other participants in this action, named below, are registered service contacts on the Odyssey eFileIL system, and thus will be served via the Odyssey eFileIL system.

Robert M. Andalman  
Diana Guler  
A&G Law, LLC  
randalman@aandglaw.com  
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/ Christopher M. R. Turner  
CHRISTOPHER M. R. TURNER  
Assistant Attorney General  
ARDC No. [REDACTED]  
100 West Randolph Street  
12th Floor  
Chicago, Illinois 60601  
(312) 814-2106 (office)  
(773) 590-7121 (cell)  
CivilAppeals@ilag.gov (primary)  
Christopher.Turner@ilag.gov (secondary)