

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MICHAEL L. SHAKMAN, <i>et al.</i>)	
)	
Plaintiffs,)	
)	
v.)	No. 69 C 2145
)	
COOK COUNTY RECORDER OF DEEDS, <i>et al.</i>)	Magistrate Judge Schenkier
)	
Defendants.)	
)	

**PLAINTIFFS’ MOTION FOR LEAVE TO FILE
BRIEF IN EXCESS OF 15 PAGES**

Plaintiffs, Michael L. Shakman, et al. (“**Plaintiffs**”), by their attorneys, pursuant to Rule 7.1, respectfully submit this Motion for Leave to File a Brief in Excess of 15 pages. In support of this Motion, Plaintiffs state as follows:

1. On December 16, 2015, the defendant, Cook County Recorder of Deeds (“**Defendant**”) filed a Motion to Amend its Exempt List. (ECF Dkt. 4426.)
2. The events leading up to the filing, however, began years before that date. The Defendant’s attempt to create a new Exempt position for a politically connected employee is part of an on-going violation of the Supplemental Relief Order in this case.
3. In response to the Motion, on January 28, 2016, the *Shakman* Compliance Administrator for the Cook County Recorder of Deeds (the “**RCA**”) filed a 15-page statement concerning the Motion. (ECF Dkt. 4471.) In her statement, the RCA raised several issues, both factual and legal, concerning the amendment of the Exempt List.
4. To decide Defendant’s Motion, the Court must examine numerous factual issues surrounding the creation of the positions to be added to the Exempt List and understand why the

Defendant is creating new positions to do jobs that are already assigned to current employees.

5. Plaintiffs have also relied on information contained in Summary Reports issued by the Office of the Independent Inspector General. The Summary Reports include information about employees and witnesses that would otherwise remain confidential. Rather than attach copies of the Summary Reports and risk disclosing information not relevant to the present motion, Plaintiffs followed the lead of the RCA and instead quoted the relevant sections from the Summary Reports.

6. As a result, Plaintiffs believe that they require more than fifteen pages to adequately address the Defendant's Motion.

7. Undersigned counsel conferred with Lisa Meador, counsel for the Defendant. Ms. Meador indicated that the Defendant opposes Plaintiffs' motion.

WHEREFORE, Plaintiffs respectfully request that this Court enter an order granting them leave to file the attached 24 page brief.

Dated: February 23, 2016

Respectfully Submitted,

Michael L. Shakman, *et al.*

By: /s/Brian I. Hays
One of Their Attorneys

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CERTIFICATE OF SERVICE

I, Brian I. Hays, an attorney, state that, on February 23, 2016, I caused a true and correct copy of the foregoing to be filed electronically via ECF/Pacer and served on all counsel of record.

/s/Brian I. Hays