

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

RNS SERVICING, LLC, and Illinois Limited
Liability Company,

Plaintiff,

v.

SPIRIT CONSTRUCTION SERVICES, INC.,
a Delaware Corporation, STEVEN VAN DEN
HEUVEL, a citizen of the State of Wisconsin,
and SHARAD TAK, a Citizen of the State of
Florida,

Defendants.

Case No. 17-cv-108

Judge Edmond E. Chang

**PLAINTIFF RNS SERVICING, LLC'S UNOPPOSED MOTION TO
MODIFY BRIEFING SCHEDULE ON DEFENDANTS'
JOINT MOTION FOR SUMMARY JUDGMENT**

Plaintiff, RNS Servicing, LLC ("RNS Servicing"), by and through its undersigned attorneys, hereby moves this Honorable Court to extend the deadline for its Response to Defendants' Combined Motion for Summary Judgment and Rule 56.1 Statement of Facts regarding the Statute of Limitations issue and Defendants' combined Reply regarding same. In support, RNS Servicing states as follows:

1. On December 19, 2018, this Court's entered the following briefing schedule for Defendants' Combined Motion for Summary Judgment:

- a. Defendants to file Combined Motion on March 18, 2019 with a 25-page limit;
- b. Plaintiff to file a single Response on April 22, 2019 with a 25-page limit;
- c. Defendants to file a Joint Reply on May 17, 2019.

See 12/19/18 Order [Dkt. 63].

2. On March 18, 2019, Defendants filed their 3-page Combined Motion [Dkt. 64]; 13-page Rule 56.1 Statement of Facts [Dkt. 65]; 3-page Affidavit in support of their Combined Motion [Dkt. 66] with more than 300 pages of exhibits [Dkt. 66-1 – 66-12]; and their 20-page Memorandum in support of their Combined Motion [Dkt. 67].

3. RNS Servicing requires more time to sufficiently respond to Defendants' filings which will include declarations of RNS Servicing's members Stephen Csar and Rebecca Elli to refute statements Defendants made in their above-referenced filings regarding their personal knowledge.

4. Therefore, RNS Servicing requests that this Court modify the briefing schedule on Defendants' Combined Motion as follows:

- a. RNS Servicing's Response to be due on May 2, 2019;
- b. Defendants' Joint Reply to be due on May 31, 2019;
- c. The previously scheduled status hearing on June 12, 2019 at 8:30 AM to remain the same.

5. On April 22, 2019, counsel for Defendants confirmed via email to counsel for RNS Servicing that none of the three Defendants object to this motion.

Dated: April 22, 2019

Respectfully submitted,

JOHNSON & BELL, LTD.,

By: /s/ Brian C. Langs

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CERTIFICATE OF SERVICE

I hereby certify that on April 22, 2019, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

/s/ Brian C. Langs