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

PRENDA LAW, INC.,	)
Plaintiff,	) CASE NO.: 1:13-cv-4341
	)
V.	) Judge: Hon. John W. Darral
PAUL GODFREAD, ALAN COOPER, and	)
JOHN DOES 1-10,	)
Defendants.	)
	)

## PRENDA LAW INC.'S MOTION TO FILE OPPOSITIN TO FEE PETITION, <u>INSTANTER</u>

Plaintiff Prenda Law, Inc. respectfully submits this surreply to respond to the new arguments raised in the Defendants' Petition for Fees. (ECF No. 61.)

- 1. The Court on January 23, 2014 granted Defendant's counsel's motion seeking sanctions. On the same the Court granted Defendant's counsel leave to file a petition in support of its motion, and reply. The due dates that those filings were February 6 and February 27, 2014. The Court granted Plaintiff until February 20 to file a response.
- 2. Defendant's counsel did not timely file either brief on time. Specifically, she filed the petition on February 7 and a "reply" on February 28. Defendant's counsel did not seek or obtain leave of the Court to file either document late.
- 3. The delay, while admittedly short, caused substantial scheduling problems for Plaintiff, due to competing professional obligations and intervening personal medical issues. As a consequence, Plaintiff did not meet the February 20 time initially set for filing the response in opposition to the petition.

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**4.** Plaintiff respectfully requests that the Court grant it leave, *instanter*, to file the attached

response in opposition to the petition for fees. The petition includes a request for a vast

amount of money for the work involved, and it raises many significant issues.

5. Plaintiff does not bring this motion for purposes of undue delay or for an improper

purpose. Plaintiff, of course, will not object to Defendants' counsel filing a reply.

WHEREFORE, for all of the foregoing reasons, Plaintiff respectfully requests

that this Court grant its Motion to respond to the fee petition, instanter, and grant any and all

further relief that the Court deems to reasonable and appropriate under the circumstances.

Respectfully submitted, PRENDA LAW, INC.

By: /s/ Paul A. Duffy

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 4, 2014, all counsel of record who are deemed to have consented to electronic service are being served a true and correct copy of the foregoing document using the Court's CM/ECF system, in compliance with Local Rule 5.2(a).

/s/ Paul Duffy
Paul Duffy