

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

National Association of Professional Allstate Agents, an association, Scott Verbarg, an individual, Brad Rehonic, an individual, and Joseph Rehonic, an individual,

Plaintiffs,

v.

Allstate Insurance Company,

Defendant.

Civil Action No. 1:21-cv-02674

Honorable John F. Kness

**AGREED MOTION FOR ENTRY OF JOINT STIPULATION REGARDING
DEADLINE FOR ALLSTATE TO ANSWER OR OTHERWISE PLEAD**

Defendant Allstate Insurance Company (“Allstate”) and Plaintiffs National Association of Professional Allstate Agents, Scott Verbarg, Brad Rehonic, and Joseph Rehonic (“Plaintiffs”), respectfully submit this Agreed Motion for a 30-day extension for Allstate to Answer or Otherwise Plead, through and including August 16, 2021.

In support of this motion, the Parties state as follows:

1. Plaintiffs filed their Complaint on May 18, 2021.
2. This litigation is complex, and the Parties request additional time to ensure adequate presentation of the issues and not for purposes of delay.
3. Counsel for the Parties have conferred and have agreed that the deadline for Allstate to answer or otherwise plead shall be August 16, 2021.
4. The Parties have not sought previous extensions in this litigation.

5. Accordingly, the Parties respectfully request that this Court grant this Agreed Motion and set the deadline for Allstate to answer or otherwise plead as August 16, 2021.

Dated: July 2, 2021

Respectfully Submitted,

/s/ Brent Holmes

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CERTIFICATE OF SERVICE

I certify that on July 2, 2021, I caused the foregoing document to be electronically filed using the CM/ECF system, which will send notice of this filing to all counsel of record. Service was also made via e-mail to:

/s/ Joshua D. Lee