

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF ILLINOIS
SPRINGFIELD DIVISION**

KEVIN W. CULP, MARLOW DAVIS,)
FREDDIE REED-DAVIS,)
DOUGLAS W. ZYLSTRA,)
JOHN S. KOLLER, STEVE STEVENSON,)
PAUL HESLIN, MARLIN MANGELS,)
GUS C. BROWNE II,)
JEANELLE WESTROM,)
SECOND AMENDMENT FOUNDATION,)
INC., ILLINOIS CARRY and)
ILLINOIS STATE RIFLE ASSOCIATION,)

Plaintiffs,)

v.)

Case No. 3:14-CV-3320-SEM-TSH

LISA MADIGAN, in her Official Capacity)
as Attorney General of the State of Illinois;)
HIRAM GRAU, in his Official Capacity as)
Director of the Illinois State Police, and)
JESSICA TRAME, as Bureau Chief of the)
Illinois State Police Firearms Services)
Bureau,)

Defendants.)

**PLAINTIFFS' MOTION TO CONTINUE HEARING ON MOTION FOR
PRELIMINARY INJUNCTION**

COME NOW the Plaintiffs, KEVIN W. CULP, MARLOW DAVIS, FREDDIE REED-DAVIS, DOUGLAS W. ZYLSTRA, JOHN S. KOLLER, STEVE STEVENSON, PAUL HESLIN, MARLIN MANGELS, JEANELLE WESTROM, SECOND AMENDMENT FOUNDATION, INC., ILLINOIS CARRY and ILLINOIS STATE RIFLE ASSOCIATION, by and through undersigned counsel, and to continue the hearing on Plaintiffs' Motion for Preliminary Injunction, currently scheduled for October 8, 2015. In support thereof, Plaintiffs state as follows:

1. Plaintiffs pending Motion for Preliminary Injunction is scheduled for October 8, 2015.

2. However, Plaintiffs' counsel is defending a two week bench trial in DuPage County, Illinois, from September 28, 2015 through October 9, 2015, captioned *American Service Insurance Company v. P&P Auto & Truck Repair, Inc.*, et al, and docketed as Case No. 2010 MR 764.

3. Plaintiff's counsel cannot be in Springfield for the hearing on the pending Motion on October 8, 2015 due to this conflict.

4. Plaintiff's counsel is available, in order of preference, on October 16, 14 or 15, 2015. Defendants' counsel was consulted on this Motion and does not object. In order, his preferred reschedule dates would be either October 15 or 16, and then October 14 if neither of those two dates are convenient for the Court.

5. In short, the preferred rescheduling choices, if convenient for the Court, are October 16, then October 15, and then October 14, 2015.

6. This Motion is not filed for dilatory purposes, nor for purposes of delay, but only so that there may be full participation at the hearing on Plaintiffs' Motion for Preliminary Injunction.

Dated: September 11, 2015

Respectfully submitted,

By: /s/ David G. Sigale
David G. Sigale

Attorney for Plaintiffs

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