

**THIS APPEAL INVOLVES A MATTER SUBJECT TO
EXPEDITED DISPOSITION UNDER RULE 604(h)**

No. 131279

IN THE

SUPREME COURT OF ILLINOIS

04
E-FILED
3/7/2025 11:39 AM
CYNTHIA A. GRANT
SUPREME COURT CLERK

PEOPLE OF THE STATE OF ILLINOIS,	)	Appeal from the Appellate Court of Illinois, No. 4-24-1100.
	)	
Plaintiff-Appellant,	)	There on appeal from the Circuit Court of the Seventh Judicial Circuit, Sangamon County, Illinois, No. 24 CF 909.
-vs-	)	
	)	
SEAN GRAYSON,	)	Honorable
	)	Ryan Cadagin,
Defendant-Appellee.	)	Judge Presiding.

Unopposed Motion for Extension of Time to File Appellee's Brief

Defendant-appellee, Sean Grayson, by Carolyn R. Klarquist, Director of Pretrial Fairness Unit, and Deborah K. Pugh, Assistant Appellate Defender, Office of the State Appellate Defender, respectfully requests an extension of time, until April 9, 2025, in which to file appellee's brief.

In support of this motion counsel states:

1. On July 18, 2024, after a hearing pursuant to 725 ILCS 5/110-6.1, the circuit court denied Grayson pretrial release. On August 19, 2024, the circuit court denied Grayson's motion for relief.
2. Grayson filed a notice of appeal on August 21, 2024, and on November 27, 2024, the appellate court remanded Grayson's case for a hearing on conditions of release.
3. On December 4, 2024, the State filed a petition for leave to appeal, which

this Court allowed on January 28, 2025.

4. A complete record was filed with this Court. The record is approximately 320 pages long.

5. After one 14-day extension of time, the State filed its opening brief on March 3, 2025.

6. Grayson's brief is currently due on March 26, 2025. This is appellate counsel's first request for an extension of time to file the brief.

7. Appellate counsel will not be able to file appellee's brief by the above due date because of other work she is currently engaged in, including helping colleagues to prepare for oral arguments before this Court in *People v. Cooper*, No. 130946, and *People v. Wallace*, No. 130173, as well as drafting a petition for leave to appeal in *People v. Allen*, No. 1-22-0596. Additionally, appellate counsel has a long-planned vacation with her family the week of March 26.

8. The delay in the filing of the brief is in no way the fault of the appellee, and he should not be penalized due to counsel's request for an extension.

9. Opposing counsel does not intend to file an objection to this motion.

WHEREFORE, appellee respectfully requests that the Court grant this motion.

Respectfully submitted,

/s/Deborah K. Pugh
DEBORAH K. PUGH
Assistant Appellate Defender
Office of the State Appellate Defender
Pretrial Fairness Unit
203 N. LaSalle St., 24th Floor
Chicago, IL 60601
(312) 814-5472
PFA.eserve@osad.state.il.us

COUNSEL FOR DEFENDANT-APPELLEE

STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

Under the penalties provided in law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this motion are true and accurate.

/s/ Deborah K. Pugh
DEBORAH K. PUGH
Assistant Appellate Defender

No. 131279

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Plaintiff-Appellant,	)	There on appeal from the Circuit
	)	Court of the Seventh Judicial
-vs-	)	Circuit, Sangamon County, Illinois,
	)	No. 24 CF 909.
	)	
SEAN GRAYSON,	)	Honorable
	)	Ryan Cadagin,
Defendant-Appellee.	)	Judge Presiding.

ORDER

This matter coming to be heard on Appellee's motion, all parties having been duly notified, and the Court being advised in the premises,

IT IS HEREBY ORDERED:

That an extension of time until April 9, 2025, in which to file Defendant-Appellant's brief is hereby allowed/denied.

JUSTICE

DATE: _____

DEBORAH K. PUGH
Assistant Appellate Defender
Office of the State Appellate Defender
Pretrial Fairness Unit
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	)	Ryan Cadagin,
Defendant-Appellee.	)	Judge Presiding.

NOTICE AND PROOF OF SERVICE

Mr. Kwame Raoul, Attorney General, 115 S. LaSalle St., Chicago, IL 60603,
 eserve.criminalappeals@ilag.gov;

Mr. David J. Robinson, Chief Deputy Director - PTFA, State's Attorneys
 Appellate Prosecutor, 725 South Second Street, Springfield, IL 62704, Safe-
 T@ilsaap.org;

John Milhiser, Sangamon County State's Attorney, 200 S. 9th St., Suite 402,
 Springfield, IL 62701-1629, Dan.Mosher@sangamonil.gov;

Mr. Sean Grayson, Macon County Jail, 333 S. Franklin Street, Decatur, IL
 62523

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct. On March 7, 2025, the Unopposed Motion for Extension of Time to File Appellee's Brief was filed with the Clerk of the Supreme Court of Illinois using the court's electronic filing system in the above-entitled cause. Upon acceptance of the filing from this Court, persons named above with identified email addresses will be served using the court's electronic filing system and one copy is being mailed to the in an envelope deposited in a U.S. mail box in Chicago, Illinois, with proper postage prepaid.

/s/Christopher Moy-Lopez

LEGAL SECRETARY

Office of the State Appellate Defender

203 N. LaSalle St., 24th Floor

Chicago, IL 60601

(312) 814-5472

Service via email is accepted at

PFA.eserve@osad.state.il.us