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OCT 21 2013

IN THE  
SUPREME COURT OF ILLINOIS

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CHICAGO

PEOPLE OF THE STATE OF ILLINOIS,	)	Appeal from the Circuit Court of
	)	Cook County – Criminal Division
Plaintiff-Appellant,	)	
	)	No. 10 CR 8092
vs.	)	
	)	The Honorable Steven J. Goebel,
ANNABEL MELONGO,	)	Judge Presiding
	)	
Defendant-Appellee.	)	

**AFFIDAVIT OF DANIEL M. FEENEY IN SUPPORT OF UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE BRIEF OF APPELLEE ANNABEL MELONGO**

This affidavit is submitted in support of Defendant-Appellee Annabel Melongo’s Unopposed Motion For Extension Of Time To File Brief of Appellee Annabel Melongo. I have personal knowledge of the matters set out in this Affidavit.

1. I am an attorney licensed to practice in the State of Illinois and a partner in the firm of Miller Shakman & Beem LLP (“Firm”).
2. The Firm has been engaged to represent Defendant-Appellee Annabel Melongo in *People v. Annabel Melongo*, Case No. 10 CR 8092. Gabriel Bankier Plotkin and I will be the attorneys principally responsible for representing Ms. Melongo on appeal in this case.
3. The State of Illinois filed its opening brief on September 27, 2013, after receiving four extensions of its filing deadline. The current deadline for Ms. Melongo to file her response brief is November 1, 2013.

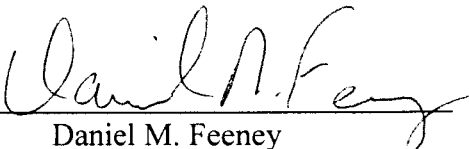
4. We first spoke to Ms. Melongo about representing her in this matter only recently, and Ms. Melongo retained us on October 17, 2013.

5. Additional time is needed for the Firm to review the record in this case, research the applicable law, and prepare a brief on behalf of Ms. Melongo. It would be very difficult to prepare a brief that effectively represents Ms. Melongo's interests in just over two weeks. Moreover, given counsels' schedule in other matters and the Thanksgiving holiday, counsel anticipates that we will need at least an additional 35 days, to and including December 6, 2013, to prepare a response.

6. Alan Spellberg, one of the attorneys for appellant State of Illinois, confirmed that the State does not object to the request for extension of time set out in the accompanying Motion.

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, I certify that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.

Dated: October 21, 2013

  
Daniel M. Feeny