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SUPREME COURT
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IN THE
SUPREME COURT OF ILLINOIS

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.)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
BRIEF OF APPELLEE ANNABEL MELONGO

Pursuant to Illinois Supreme Court Rule 343(c), Appellee Annabel Melongo, through her counsel, respectfully requests that the deadline for filing her brief in the above-captioned case be extended to December 6, 2013. In support of her motion, Ms. Melongo states the following:

1. This is a direct appeal of a judgment of the Circuit Court declaring unconstitutional the Illinois Eavesdropping Statute, 720 ILCS 5/14, and dismissing the indictment against Ms. Melongo.
2. The State of Illinois filed a timely Notice of Appeal on August 9, 2012.
3. Since that time, the State of Illinois has sought and received four extensions of time to file its opening brief. The State finally filed its brief on September 27, 2013.
4. The deadline for Ms. Melongo to file her responsive brief is November 1, 2013.

5. Ms. Melongo represented herself pro se in the Circuit Court. On November 14, 2012, this Court appointed Timothy J. Storm as counsel to represent Ms. Melongo. However, on January 24, 2013, Mr. Storm filed a motion to withdraw, leaving Ms. Melongo once again without representation.

6. As set forth in the attached verification, Ms. Melongo and her undersigned attorneys at Miller Shakman & Beem were first in contact only recently, and Ms. Melongo officially retained the firm on October 17, 2013. The firm is filing its appearance concurrently with the instant motion.

7. As further set forth in the attached verification, additional time is needed for Miller Shakman & Beem to review the record, research the 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 and, given counsels' schedule and the Thanksgiving holiday, Ms. Melongo requests that the deadline for filing her brief in the above-captioned case be extended to December 6, 2013.

8. At issue in this case is the constitutionality of the Illinois Eavesdropping Statue, 720 ILCS 5/14. As such, the case presents a significant issue of public importance. Permitting counsel adequate time to prepare a brief on behalf of Ms. Melongo will ensure that this Court is presented with the arguments and legal support necessary to fully address the issues raised.

9. This is Ms. Melongo's first request for an extension of time.

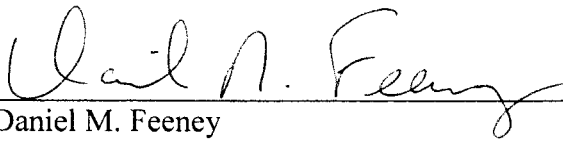
10. Alan Spellberg, one of the attorneys for appellant State of Illinois, confirmed that the State does not object to the request for extension of time set out in this Motion.

WHEREFORE, Ms. Melongo respectfully requests that the deadline for filing her brief in the above-captioned case be extended to December 6, 2013.

Dated: October 21, 2013

Respectfully submitted,

ANNABEL MELONGO

By: 
Daniel M. Feeney
One of her Attorneys

Daniel M. Feeney
Gabriel B. Plotkin
MILLER SHAKMAN & BEEM LLP
180 North LaSalle Street
Suite 3600
Chicago, Illinois 60601
(312) 263-3700