

**ILLINOIS INDEPENDENT TAX TRIBUNAL  
CHICAGO, ILLINOIS**

---

---

AMERICAN AVIATION SUPPLY LLC,	)	
	)	
Petitioner,	)	
	)	
	)	21 TT 27
v.	)	21 TT 54
	)	Judge Brian F. Barov
ILLINOIS DEPARTMENT	)	
OF REVENUE,	)	
	)	
Respondent.	)	

---

---

**MOTION FOR EXTENSION OF TIME  
TO FILE DEPARTMENT’S RESPONSE BRIEF**

The Department of Revenue (the “Department”) hereby requests an extension of time to file its brief in response to the Petitioner’s Motion for Summary Judgment. In support of its motion, the Department states as follows:

1. On February 17, 2022, the parties appeared before Judge Barov for a status conference. At that conference, Judge Barov proposed dates for a briefing schedule that Petitioner’s counsel stated they could not agree to due to the press of other deadlines they had. In the spirit of cooperation, counsel for the Department told Judge Barov they would have no objection to the Petitioner’s request for dates later than those initially proposed by Judge Barov for the briefing schedule in this matter.

2. Pursuant to the order entered on February 17, 2022, the due date for the Department’s brief was June 22, 2022.

3. On June 22, 2022, counsel for the Department contacted Petitioner’s counsel via email requesting their agreement for the Department to file its response brief with the Tribunal on August 31, 2022. Department counsel explained that its office remains short

staffed, and that when it agreed to the proposed dates that Judge Barov included in his order of February 17, 2022, it had not been notified that the Department would be in the process of moving offices during the same week that its brief was due.

4. In the Department's June 22, 2022 email to opposing counsel, Ms. Tsatsoulis included as part of its request for cooperation for an extension of time the fact that she will be out of the office for over two weeks in July of 2022.

5. In addition to a heavy case load and time spent in preparing for an office move, Ms. Hunter has had limited availability due to her own health issues and those of her children who both tested positive for Covid during the last week. She is also in the process of completing the required MCLE before the June 30th deadline, which has reduced her availability, as well. As a result, counsel for the Department were unable to complete the Department's brief in response by the June 22, 2022 due date.

Wherefore, the Department respectfully requests that the due date of June 22, 2022 be stricken and that a new due date of August 31, 2022 be set.

Respectfully submitted,

/s/Konstantina J. Tsatsoulis and  
Paula M. Hunter

Konstantina J. Tsatsoulis and  
Paula M. Hunter  
Attorneys  
Illinois Department of Revenue  
100 West Randolph St., Ste. 700  
Chicago, Illinois 60601

**CERTIFICATE OF SERVICE**

Undersigned counsel for the Department, being fully sworn upon oath, deposes and states that a copy of the foregoing Department's Motion for Extension of Time to File the Department's Response Brief, was served on this 23rd day of June, 2022 by email to the individuals listed below:

Mary A. McNulty  
HOLLAND & KNIGHT LLP  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
214-969-1187  
[Mary.McNulty@hklaw.com](mailto:Mary.McNulty@hklaw.com)

Lee S. Meyercord  
HOLLAND & KNIGHT LLP  
1722 Routh Street, Suite 1500  
Dallas, TX 75201  
214-969-1315  
[Lee.Meyercord@hklaw.com](mailto:Lee.Meyercord@hklaw.com)

Thomas J. Kinasz  
HOLLAND & KNIGHT LLP  
150 North Riverside Plaza, Suite 2700  
Chicago, IL 60606  
312-715-5719  
[Tom.Kinasz@hklaw.com](mailto:Tom.Kinasz@hklaw.com)

/s/Konstantina J. Tsatsoulis and  
Paula M. Hunter  
Konstantina J. Tsatsoulis and  
Paula Hunter  
Attorneys  
Illinois Department of Revenue  
100 W. Randolph St., 7th Floor  
Chicago, IL 60601  
312-814-1533 (direct)