

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

Victor M. Gonzalez, Administrator)	
of the Estate of Roger Gonzalez,)	
deceased,)	
)	No. 15-cv-00776
<i>Plaintiff,</i>)	
)	<i>(Judge Reinhard)</i>
<i>-vs-</i>)	
)	
Wexford Health Sources, Inc.,)	<i>(Magistrate Judge Jensen)</i>
)	
<i>Defendant.</i>)	

**AGREED MOTION
TO FIND SETTLEMENT IN GOOD FAITH AND
STIPULATION TO DISMISS DEFENDANT WEXFORD**

Plaintiff, with the agreement of defendant, requests the Court find that the confidential settlement agreement reached between the parties is a good faith resolution of the remaining issues in this case. Upon this finding, the parties jointly stipulate to the dismissal of the Wexford Health Sources, Inc., the sole remaining defendant.

Grounds for this motion are as follows:

1. Plaintiff and Wexford Health Sources, Inc. have agreed to resolve all issues remaining in this case for the same amount paid on behalf of defendant Israel.
2. The Court found the previous settlement to be a good faith resolution of this case. (ECF No. 246, Order, July 15, 2020.) The parties request

that the Court make the same finding in this case. As with the previous order, the parties request leave to submit the confidential settlement agreement for in camera inspection.

3. Upon approval of the settlement, the parties request that the Court dismiss this case with prejudice and without costs, thereby resolving all claims against all parties.

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