

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

Ben Baker and Clarissa Glenn,	)	
	)	Case No. 16 C 8940
Plaintiffs	)	
v.	)	Hon. Franklin Valderrama
	)	
City of Chicago, et al.,	)	
	)	
Defendants	)	

**DEFENDANT RONALD WATTS’  
UNOPPOSED MOTION LEAVE TO JOIN PORTIONS OF  
CO-DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Defendant, Ronald Watts, by his attorneys, Special Assistant Corporation Counsel Brian P. Gainer and Lisa M. McElroy of Johnson & Bell, Ltd., moves this Honorable Court for leave to join and adopt portions of his co-defendants’ motion for summary judgment [Dkt. 396], filed pursuant to Federal Rule of Civil Procedure 56. In support of his motion for leave, Defendant Watts states as follows:

1. Defendant Watts is a former Sergeant of the Chicago police department. He is one of many defendants sued by Plaintiffs for alleged misconduct that occurred when Plaintiffs were arrested in March and December of 2005. Plaintiffs claim, generally, that each of the defendants, including Defendant Watts, violated their civil rights and Illinois law in various ways during these arrests and the subsequent prosecutions.

2. Defendant Watts is entitled to summary judgment, for the reasons set forth in sections I (pp. 6-11); II(A<sup>1</sup>) (pp. 11-20); III(B)(1) (pp. 28-33); III(B)(3) (pp. 36-

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<sup>1</sup> Not including sub-paragraphs #4 and #5.

39); IV (pp. 39-46); V (pp. 47-48); VIII(A-B) (pp. 52-54) and IX (pp. 55-56) of his co-defendants' Motion for Summary Judgment. [Dkt. 396].

3. Defendant Watts hereby respectfully requests leave to join, adopt, and incorporate the arguments and reasoning in these sections of his co-defendants' motion and memorandum. Defendant Watts also seeks to join, adopt, and incorporate the Undisputed Facts [Dkt. 397, 398] cited by his co-defendants in support of these arguments in their motion.

4. This request is being made in the interest of judicial efficiency. No party is or will be prejudiced by the granting of this request.

5. On September 5, 2024, counsel for Watts and Plaintiffs conferred, and Plaintiffs' counsel indicated that Plaintiffs do not oppose this motion for leave.

Defendant Ronald Watts respectfully requests that this Honorable Court grant him leave to join the above referenced portions of the summary judgment motion filed by Defendants Bolton, Gonzalez, Jones, Leano, Nichols, and Smith, or for any other relief that this Honorable Court deems equitable and just.

Respectfully submitted,

/s/ Brian P. Gainer  
Special Assistant Corporation Counsel

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*Counsel for Defendant Ronald Watts*

**CERTIFICATE OF SERVICE**

The undersigned on oath certifies that he served **Defendant Ronald Watts' Unopposed Motion for Leave to Join Certain Portions of His Co-Defendants' Motion for Summary Judgment** to all counsel of record, via electronic filing, on **September 6, 2024**.

/s/ Brian P. Gainer  
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