

# Exhibit 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LEONARD GIPSON, )  
 )  
 Plaintiff, )  
 ) No. 18 cv 5120  
 v. )  
 )  
 CITY OF CHICAGO, Former CHICAGO )  
 POLICE SERGEANT RONALD WATTS, )  
 Former OFFICER KALLATT )  
 MOHAMMED, SERGEANT ALVIN ) Honorable Steven Seeger  
 JONES, OFFICER ELSWORTH SMITH )  
 JR.. OFFICER DOUGLAS NICHOLS JR., )  
 OFFICER BRIAN BOLTON, OFFICER )  
 MANUEL LEANO, OFFICER KENNETH )  
 YOUNG, OFFICER DARREL )  
 EDWARDS, OFFICER MATTHEW )  
 CADMAN, MICHAEL SPAARGAREN, )  
 OFFICER GEORGE SUMMERS, )  
 OFFICER CALVIN RIDGELL, OFFICER )  
 ROBERT GONZALEZ, OFFICER )  
 LAMONICA LEWIS, PHILIP CLINE, )  
 DEBRA KIRBY, KAREN ROWAN, and )  
 any other yet-unidentified officers of the )  
 Chicago Police Department, )  
 ) *Jury Demand*  
 Defendants. )

**PLAINTIFF'S RESPONSE TO DEFENDANT  
MOHAMMED'S MOTION TO AMEND HIS ANSWER**

Plaintiff Leonard Gipson responds to Defendant Kallatt Mohammed's motion for leave to amend his answer to Plaintiff's Complaint as follows:

1. On September 6, 2024, Defendant Mohammed moved for leave to amend his answer to Plaintiff's Complaint. (Dkt. 129). Specifically, Mohammed seeks to amend his Answer to withdraw his Fifth Amendment invocation.

2. On September 11, 2024, this Court entered a minute order highlighting that Mohammed's prior assertion of the Fifth Amendment is an evidentiary privilege, and any question about the admissibility of the prior invocation is premature. Dkt. 131. This Court, however, allowed Plaintiff to file a response in the event Plaintiff wanted to add anything. *Id.*

3. Plaintiff does intend to present Mohammed's prior invocation of the Fifth Amendment to the jury

4. That said, Plaintiff agrees with the Court that it is premature to decide any disputes about this evidentiary issue.

Respectfully Submitted,

/s/ Gianna Gizzi  
One of Plaintiffs' Attorneys

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