

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

LIONEL WHITE,	)	
	)	No. 17 C 02877
Plaintiff,	)	
	)	The Honorable Sara Ellis
vs.	)	
	)	
CITY OF CHICAGO, et al.	)	Magistrate Judge Laura K. McNally
	)	
Defendants.	)	

**DEFENDANT OFFICERS' MOTION FOR LEAVE TO FILE  
OVERSIZED MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

Defendants, Alvin Jones, Elsworth J. Smith, Jr., Manuel Leano, Brian Bolton, Robert Gonzalez, and Douglas Nichols (collectively "Defendant Officers"), by their attorneys, submit this unopposed motion for leave to file an oversized motion for summary judgment. In support thereof, Defendant Officers state:

1. Defendant Officers' motion for summary judgment is due to be filed March 31, 2025. Dkt. 221.
2. Plaintiffs filed a 19-page Complaint, consisting of 77 paragraphs containing multiple claims, against multiple defendants, based on multiple legal theories. Dkt. 1.
3. Due to the number and complexity of the issues required to be addressed, Defendant Officers' Motion for Summary Judgment exceeds the limit provided by the local rules, without leave of court.
4. Defendant Officers respectfully submit that its oversized motion, which contains 34 pages, are warranted due to the number and complexity of the

legal issues.

5. A copy of Defendant Officers' Motion for Summary Judgment is attached hereto as Exhibit A, which will be filed once leave is granted.
6. Undersigned counsel for Defendant Officers conferred with Plaintiffs' counsel regarding this motion, and Plaintiffs' counsel indicated the motion could be filed as unopposed.

**WHEREFORE**, Defendant Officers respectfully requests leave of court to file their oversized Motion for Summary Judgment, consisting of 34 pages, as well as any other relief that this Court deems appropriate.

Respectfully submitted,

/s/ Amy A. Hijjawi

Special Assistant Corporation Counsel  
*Attorneys for Defendant Officers*

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, I electronically filed the foregoing **Defendant Officers' Motion for Leave to File Oversized Motion for Summary Judgment (*Unopposed*)** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to counsel of record.

/s/ Amy A. Hijawi