

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

Lionetta White, Special Administrator of the )  
Estate of LIONEL WHITE, SR., )  
 )  
Plaintiff, ) Case No. 17 C 2877  
 )  
v. ) Judge Sara L. Ellis  
 )  
CITY OF CHICAGO, RONALD WATTS, )  
ALVIN JONES, ELSWORTH SMITH JR., )  
KALLATT MOHAMED, MANUEL )  
LEANO, BRIAN BOLTON, ROBERT )  
GONZALEZ, and DOUGLAS NICHOLS, )  
 )  
Defendants. )

**DEFENDANT CITY OF CHICAGO'S MOTION FOR LEAVE  
TO FILE OVERSIZED MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

Defendant, the City of Chicago (“City”), submits this unopposed motion for leave to file an oversized Memorandum of Law in Support of Its Motion for Summary Judgment. In support thereof, the City states:

1. The City’s motion for summary judgment is due to be filed March 31, 2025. (Dkt. #221).
2. Due to the number and complexity of the issues required to be addressed, the City’s Memorandum of Law in Support of Its Motion for Summary Judgment exceeds the page limit allowed by the local rule without leave of court.
3. The City respectfully submits that its oversized memorandum of law, which consists of 35 pages, is warranted due to the number and complexity of the legal issues. The City’s brief is attached as Exhibit A.
4. Undersigned counsel for the City conferred with Plaintiff’s counsel regarding the motion. Plaintiff’s counsel indicated the motion could be presented as unopposed.

WHEREFORE, Defendant, City of Chicago, respectfully requests leave of court to file its oversized Memorandum of Law in Support of Its Motion for Summary Judgment, consisting of 35 pages, as well as any other relief this Court deems appropriate.

Respectfully submitted,

MARY B. RICHARDSON-LOWRY  
Corporation Counsel, City of Chicago

By: s/ Paul A. Michalik  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **March 31, 2025**, I electronically filed the foregoing **City Defendants' Motion for Leave to File oversized motion for summary judgement (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/ Paul A. Michalik

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