

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

LIONEL WHITE,)	
)	
Plaintiff,)	Case No. 17-CV-02877
)	
versus)	Hon. Sara L. Ellis
)	
CITYOF CHICAGO, et al.)	
)	
Defendants.)	

**DEFENDANT RONALD WATTS'
MOTION FOR 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' motions for summary judgment [Dkt. 224, 225, 254], 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 Plaintiff for alleged misconduct that occurred when Plaintiff was arrested on April 24, 2006. Plaintiff claims, generally, that each of the defendants, including Defendant Watts, violated his civil rights and Illinois law in various ways during his arrest and the subsequent prosecutions.

2. Defendant Watts is entitled to summary judgment for the reasons set forth in sections I (pp. 6-7); III (pp. 17-21); IV (pp. 22-24), and V (pp. 24-34) of his co-defendants' Motion for Summary Judgment. [Dkt. 254]. Further, Defendant Watts is entitled to summary judgment

for the reasons set forth in the arguments made by Defendant Kallatt Mohammed on pages 1-8 of his Memorandum in Support of Summary Judgment. [Dkt. 225].

3. Defendant Watts hereby respectfully requests leave to join, adopt, and incorporate the arguments and reasoning in these sections of his co-defendants' motions and memoranda. Defendant Watts also seeks to join, adopt, and incorporate the Undisputed Facts [Dkt. 240] cited by his co-defendants in support of these arguments in their motions.

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 April 14, 2025, counsel for Watts and Plaintiff conferred, and Plaintiff's counsel indicated that Plaintiff is not taking a position on this request. In light of this Court's March 24, 2025 order [Dkt. 221], counsel for Defendant Watts represents that this motion is not meant to have any impact on the current summary judgment briefing schedule. Plaintiff's counsel agrees that, if this Court grants the request, it should not affect the current summary judgment briefing schedule.

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 Jones, Smith, Leano, Bolton, Gonzalez, and Nichols and separately by Defendant Kallatt Mohammed [Dkt. 224, 225, 254], 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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33 W. Monroe St., Suite 2700
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Counsel for Defendant Ronald Watts

CERTIFICATE OF SERVICE

The undersigned on oath certifies that he served **Defendant Ronald Watts' Motion for Leave to Join Certain Portions of His Co-Defendants' Motion for Summary Judgment** to all counsel of record, via electronic filing, on **April 14, 2025**.

/s/ Brian P. Gainer

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