

**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,)

v.)

Case No. 17 C 2877

CITY OF CHICAGO, RONALD WATTS,)

Judge Sara L. Ellis

ALVIN JONES, ELSWORTH SMITH JR.,)

KALLATT MOHAMMED, MANUEL)

Magistrate Judge Laura K. McNally

LEANO, BRIAN BOLTON, ROBERT)

GONZALEZ, and DOUGLAS NICHOLS,)

Defendants.)

**CERTAIN DEFENDANTS' MOTION FOR LEAVE TO FILE
OVERSIZED REPLY BRIEF IN SUPPORT OF THEIR
MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

NOW COME Certain Defendants Alvin Jones, Elsworth Smith Jr., Manuel Leano, Brian Bolton, Robert Gonzalez, and Douglas Nichols and submit their unopposed motion for leave to file an oversized reply brief in support of their motion for summary judgment as follows:

1. Certain Defendants' reply in support of their motion for summary judgment is due to be filed May 23, 2025. (Dkt. #281).
2. All parties in this matter have filed motions, responses, and replies to summary judgment that are well over the page limit allowed by local rule. Due to the number and complexity of the issues required to be addressed, Certain Defendants' reply brief in support of their motion for summary judgment exceeds the page limit allowed by the local rule without leave of court.

3. Certain Defendants respectfully submit that their oversized memorandum of law, which consists of 38 pages, is warranted due to the number and complexity of the legal issues. Certain Defendants' reply is attached as Exhibit A.
4. Counsel for Certain Defendants has conferred with Plaintiff's counsel regarding this motion. Plaintiff's counsel indicated the motion could be presented as unopposed.

WHEREFORE, Certain Defendants respectfully request leave to file their oversized reply in support of their motion for summary judgment, as well as any other relief this Court deems appropriate.

Respectfully submitted,

/s/ Jason Marx

Special Assistant Corporation Counsel for Certain Defendants

Andrew Hale
Amy Hijjawi
Jason Marx
Kelly Olivier
Anthony Zecchin
Jennifer Bitoy
Hannah Beswick-Hale
Dylan Burdelik
Michelle Heyman-Kantor
Mary Johnston
HALE & MONICO, LLC
53 W. Jackson Blvd, Suite 334
Chicago, IL 60604
(312) 870-6912
jmarx@halemonico.com
Attorney No. 6279266

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, I electronically filed the foregoing Motion with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record.

/s/ Jason Marx