

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

WILLIAM CARTER, )  
 )  
 Plaintiff, ) Case No. 17 CV 7241  
 v. ) Hon. LaShonda Hunt  
 )  
 CITY OF CHICAGO, et al., )  
 )  
 Defendants. )

**DEFENDANT KALLATT MOHAMMED'S MOTION FOR LEAVE TO  
DEPOSE AN INCARCERATED WITNESS**

Defendant, Kallatt Mohammed ("Mohammed"), by and through one of his attorneys, Special Assistant Corporation Counsel Eric S. Palles of Mohan Groble Scolaro, P.C., pursuant to Federal Rule of Civil Procedure 30(a)(2)(B), moves this Court to grant his Motion for Leave to Depose an Incarcerated Witness. In support, Mohammed states as follows:

1. As a part of his Complaint, Plaintiff alleges that he was falsely arrested on June 18, 2024 by Defendant Officers, including Defendant Mohammed

2. Roy Tate (New Jersey Department of Corrections Inmate No. 106738H) is disclosed as a fact witness in Plaintiff William Carter's Rule 26(a)(1) disclosures and his deposition has been identified as one yet to be completed in the Watts Coordinated Proceedings. 19-cv-1717, Doc. 806-1, at page 2.

3. Through discovery in this matter, it was determined that Mr. Tate was Plaintiff's co-arrestee on June 18, 2004, the day of the alleged false arrest.

4. Pursuant to Federal Rule of Civil Procedure 30(a)(2)(B), Defendants hereby request leave of court to depose Mr. Tate at or near Hope Hall Halfway House in Camden County, New Jersey, with counsel for the parties appearing by Zoom.

5. At the status hearing before Judge Finnegan on September 24, 2024, when counsel advised that he was preparing the instant motion, Judge Finnegan stated that, in light of the imminent end to their referral, this motion should be directed to this Court.

WHEREFORE, for the foregoing reasons, Defendant Mohammed respectfully requests that this Court grant his Motion for Leave to Depose an Incarcerated Witness and issue an order permitting the deposition of Roy Tate to proceed via Zoom on October 22, 2024 at 10:30 a.m. EDT.

Respectfully submitted,

/s/ Eric S. Palles #2136473  
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