

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

|                                      |   |                          |
|--------------------------------------|---|--------------------------|
| WILLIAM CARTER,                      | ) |                          |
|                                      | ) |                          |
| Plaintiff,                           | ) |                          |
|                                      | ) | Case Number: 17-CV-07241 |
| v.                                   | ) |                          |
|                                      | ) | Honorable LaShonda Hunt  |
| CITY OF CHICAGO, RONALD WATTS,       | ) | Mag. Sheila M. Finnegan  |
| DARRYL EDWARDS, ALVIN JONES,         | ) |                          |
| KALLATT MOHAMMED,                    | ) |                          |
| JOHN RODRIGUEZ, CALVIN RIDGELL, JR., | ) |                          |
| ELSWORTH J. SMITH, JR., GEROME       | ) |                          |
| SUMMERS, JR.,                        | ) |                          |
| and KENNETH YOUNG, JR.,              | ) |                          |
|                                      | ) |                          |
| Defendants.                          | ) |                          |

**DEFENDANT RONALD WATTS' NOTICE 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., in accordance with this Court's order of December 12, 2024 [Dkt. 192], hereby gives notice of his intent to join and adopt portions of his co-defendants' motion for summary judgment [Dkt. 194, 195], filed pursuant to Federal Rule of Civil Procedure 56. In support of his notice, 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 March 3, 2004 and June 18, 2004. Plaintiff claims, generally, that each of the defendants, including Defendant Watts, violated his civil rights and Illinois law in various ways during these arrests and the subsequent prosecutions.

2. Defendant Watts is entitled to summary judgment, for the reasons set forth in sections II (pp. 17-30); III (pp. 30-33); IV (pp. 33-37); V (pp. 37-39); and VI (pp. 39-40); of his co-defendants' Motion for Summary Judgment. [Dkt. 194].

3. Defendant Watts hereby respectfully requests leave to join, adopt, and incorporate the arguments and reasoning in these sections of his co-defendants' motion and memorandum. [Dkt. 194]. Defendant Watts also seeks to join, adopt, and incorporate the Undisputed Facts [Dkt. 195] cited by his co-defendants in support of these arguments in their motion.

4. This notice is being given in the interest of judicial efficiency. No party is or will be prejudiced by the granting of this request.

5. On December 20, 2024, counsel for Watts and Plaintiff conferred, and Plaintiff's counsel indicated that Plaintiff does not oppose this joinder.

Defendant Ronald Watts, in accordance with this Court's December 12, 2024, order [Dkt. 192], hereby gives notice of an intent to join the above referenced portions of the summary judgment motion filed by Defendants Ridgell, Edwards, Jones, Rodriguez, Smith, Jr., Summers, Jr., and Young, Jr. [Dkt. 194, 195].

Respectfully submitted,

/s/ Brian P. Gainer  
Special Assistant Corporation Counsel

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*Counsel for Defendant Ronald Watts*

**CERTIFICATE OF SERVICE**

The undersigned on oath certifies that he served **Defendant Ronald Watts' Notice to Join Certain Portions of His Co-Defendants' Motion for Summary Judgment** to all counsel of record, via electronic filing, on **December 20, 2024**.

*/s/ Brian P. Gainer*

Special Assistant Corporation Counsel

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