

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

Leticia Vargas, Administrator of the)
Estate of Angel Cruz,)
) 18-cv-1865
 Plaintiff,)
) (*Judge Seeger*)
 -vs-)
)
 County of Cook, et al.,)
)
 Defendants.)

PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff, by counsel, moves for summary judgment on her federal claims against defendants Kanel, Chatman, Manalastas, and Dr. Paschos and on her state law medical malpractice claim against defendant County of Cook for the conduct of Kanel, Chatman, Manalastas, and Dr. Paschos.

Grounds for this motion are set out in plaintiff's contemporaneously filed memorandum.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 South Michigan Ave. Ste 201
Chicago, Illinois 60604
(312) 427-3200
Attorneys for Plaintiffs