

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

Leticia Vargas, Administrator of)
the Estate of Angel Cruz,)
Plaintiff,)
v.) No. 18-cv-1865
County of Cook, Augustus Alabi,) Judge Steven Seeger
Lorraine Chatman, Helen Kanel,)
Cherri Krzyzowski, Manuel Manalastas,) JURY DEMANDED
and Dr. Steve Paschos,)
Defendants.)

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, HELEN KANEL, MANUEL MANALASTAS, LORRAINE CHATMAN, AUGUTSUS ALABI, and CHERRI KRZYZOWSKI, by and through their attorney, KIMBERLY M. FOXX, State's Attorney of Cook County, through William R. Ragen, hereby move for an entry of summary judgment in their favor, and who also submits their Local Rule 56.1(a) Statement of Material Facts and Supporting Exhibits, and Memorandum of Law in Support of their Rule 56 Motion for Summary Judgment.

Respectfully Submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ William R. Ragen
William R. Ragen
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CERTIFICATE OF SERVICE

I, William Ragen, Assistant State's Attorney, hereby certify that the above and foregoing was served upon the Plaintiff on August 31, 2021, electronically via the ECF-CM system.

/s/ *William Ragen*
William Ragen