

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

ANGELO SHENAULT, JR., )  
Plaintiff, )  
v. ) Case No. 18 C 3478  
CITY OF CHICAGO, RONALD WATTS, )  
PHILLIP CLINE, DEBRA KIRBY, BRIAN )  
BOLTON, ROBERT GONZALEZ, ALVIN )  
JONES, MANUEL LEANO, LAMONICA )  
LEWIS, KALLATT MOHAMMED, )  
DOUGLAS NICHOLS JR., AND )  
ELSWORTH SMITH JR., )  
Defendants. )

**STIPULATION TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by their respective attorneys of record, that this matter has been settled by the parties and, therefore, all claims related to this cause should be dismissed without prejudice, to be automatically converted to dismissal with prejudice on June 15, 2026, unless a party has moved to extend that date prior to June 15, 2026. Each side shall bear its own costs and attorneys' fees.

Respectfully submitted,

s/ Joel A. Flaxman

Kenneth N. Flaxman

Joel A. Flaxman

Attorneys for Plaintiff, Angelo Shenault, Jr.

Law Offices of Kenneth N. Flaxman

200 S. Michigan Ave., Suite 201

Chicago, IL 60604

(312) 427-3200

DATE: November 12, 2025

CITY OF CHICAGO a Municipal Corporation

Mary B. Richardson-Lowry

Corporation Counsel

BY: s/ Victoria R. Benson

Victoria R. Benson

Deputy Corporation Counsel

121 North LaSalle Street, Room 600

Chicago, Illinois 60602

(312) 744-1015

DATE: November 12, 2025

*s/ Terrence M. Burns*

Terrence M. Burns  
Paul A. Michalik  
Daniel M. Noland  
Attorneys for Defendants, City of Chicago,  
Philip Cline, and Debra Kirby  
Special Assistant Corporation Counsel  
Burns Noland LLP  
311 S. Wacker Drive, Suite 5200  
Chicago, Illinois 60606  
(312) 982-0090  
DATE: November 12, 2025

*s/ Brian P. Gainer*

Brian P. Gainer  
Lisa M. McElroy  
Attorneys for Defendant, Ronald Watts  
Special Assistant Corporation Counsel  
Johnson & Bell, Ltd.  
33 W. Monroe Street, Suite 2700  
Chicago, Illinois 60603  
(312) 372-0770  
DATE: November 12, 2025

*s/ Eric S. Palles*

Eric S. Palles  
Sean M. Sullivan  
Attorneys for Defendant, Kallat Mohammed  
Special Assistant Corporation Counsel  
Mohan Groble Scolaro P.C.  
55 W. Monroe Street, Suite 1600  
Chicago, Illinois 60603  
(312) 422-9999  
DATE: November 12, 2025

*s/ Jason Marx*

Andrew M. Hale  
Kelly Olivier  
Jason Marx  
Attorneys for Defendants, Brian Bolton, Robert  
Gonzalez, Alvin Jones, Manuel Leano,  
Lamonica Lewis, Douglas Nichols, Jr., Elsworth  
Smith, Jr.  
Special Assistant Corporation Counsel  
Hale & Monico, LLC  
53 W. Jackson, Suite 337

Chicago, Illinois 60604  
(312) 341-9646  
DATE: November 12, 2025