

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

GOLEATHER JEFFERSON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 18 C 8182
	)	
CITY OF CHICAGO, RONALD WATTS,	)	Judge LaShonda A. Hunt
PHILIP CLINE, DEBRA KIRBY, ALVIN	)	
JONES, MANUEL LEANO, KALLATT	)	
MOHAMMED, DOUGLAS NICHOLS, JR.,	)	
and ELSWORTH J. 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, *Goleather Jefferson*  
Law Offices of Kenneth N. Flaxman  
200 S. Michigan Ave., Suite 201  
Chicago, IL 60604  
(312) 427-3200  
DATE: November 13, 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 13, 2025

s/ Paul A. Michalik  
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 13, 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 13, 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 13, 2025

s/ Kelly Olivier  
Andrew M. Hale  
Kelly Olivier  
Jason Marx  
Attorneys for Defendants, *Alvin Jones, Manuel*  
*Leano, Douglas Nichols, Jr., and Elsworth*  
*Smith, Jr.*  
Special Assistant Corporation Counsel  
Hale & Monico, LLC  
53 W. Jackson, Suite 337  
Chicago, Illinois 60604  
(312) 341-9646  
DATE: November 13, 2025