

**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.	)	

**AGREED ORDER OF DISMISSAL**

This matter coming before the Court on the Stipulation of the parties, the parties having reached agreement to settle this matter, and the respective parties being represented by counsel, Plaintiff, Goleather Jefferson, by his attorneys, Law Offices of Kenneth N. Flaxman; Defendant City of Chicago, by its attorney, Mary B. Richardson-Lowry, Corporation Counsel of the City of Chicago; Defendants Philip Cline and Debra Kirby, by their attorneys, Burns Noland LLP, Special Assistant Corporation Counsel; Defendant Ronald Watts, by his attorneys, Johnson & Bell, Ltd., Special Assistant Corporation Counsel; Defendant Kallatt Mohammed, by his attorneys, Mohan Groble Scolaro, P.C., Special Assistant Corporation Counsel; and Defendants Alvin Jones, Manuel Leano, Douglas Nichols, Jr., and Elsworth Smith, Jr., by their attorneys, Hale & Monico, LLC, Special Assistant Corporation Counsel; and the parties have entered into a Release and Settlement Agreement and Stipulation to Dismiss, the Court being otherwise fully advised in the premises, orders as follows:

All the claims of Plaintiff Goleather Jefferson against Defendants City of Chicago, Philip Cline, Debra Kirby, Ronald Watts, Kallatt Mohammed, Alvin Jones, Manuel Leano, Douglas

Nichols, Jr., and Elsworth Smith, Jr., including all claims against unknown, unidentified, and/or unserved officers and agents of the Chicago Police Department, are hereby 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.

All other court-ordered dates and deadlines are vacated.

ENTER: LaShonda A. Hunt  
HONORABLE LASHONDA A. HUNT  
UNITED STATES DISTRICT JUDGE

Terrence M. Burns  
Daniel M. Noland  
Paul A. Michalik  
Attorneys for Defendant City of Chicago  
Special Assistant Corporation Counsel  
Burns Noland LLP  
311 S. Wacker Drive, Suite 5200  
Chicago, Illinois 60606  
(312) 982-0090