

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

VONDELL WILBOURN,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 19 C 0132
	)	
CITY OF CHICAGO, RONALD WATTS,	)	Judge John F. Kness
PHILIP CLINE, DEBRA KIRBY, BRIAN	)	
BOLTON, DARRYL EDWARDS, ROBERT	)	
GONZALEZ, ALVIN JONES, MANUEL	)	
LEANO, KALLATT MOHAMMED,	)	
DOUGLAS NICHOLS, JR., CALVIN	)	
RIDGELL, JOHN RODRIGUEZ,	)	
ELSWORTH SMITH, JR., GEROME	)	
SUMMER, JR., KENNETH YOUNG, 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, *Vondell Wilbourn*
Law Offices of Kenneth N. Flaxman
200 S. Michigan Ave., Suite 201
Chicago, IL 60604
(312) 427-3200
DATE: November 14, 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 14, 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 14, 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 14, 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 14, 2025

s/ Kelly Olivier

Andrew M. Hale

Kelly Olivier

Jason Marx

Attorneys for Defendants, *Brian Bolton, Darryl*
Edwards, Robert Gonzalez, Alvin Jones, Manuel

Leano, Douglas Nichols, Jr., John Rodriguez,
Elsworth Smith, Jr., Gerome Summers, Jr., and

Kenneth Young, Jr.

Special Assistant Corporation Counsel

Hale & Monico, LLC

53 W. Jackson, Suite 337
Chicago, Illinois 60604
(312) 341-9646
DATE: November 14, 2025

s/ Timothy P. Scahill
Steven B. Borkan
Timothy P. Scahill
Borkan & Scahill, Ltd.
Attorneys for Defendant, *Calvin Ridgell, Jr.*
Special Assistant Corporation Counsel
20 S. Clark St., Suite 1700
Chicago, IL 60302
(312) 580-1030
DATE: November 14, 2025