

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

In re: WATTS COORDINATED PRETRIAL PROCEEDINGS ) Master Docket Case No. 19-cv-01717  
 )  
 ) Judge Franklin U. Valderrama  
 )  
 ) Magistrate Judge Sheila M. Finnegan  
 )

**DEFENDANTS' JOINT MOTION FOR LEAVE TO FILE OVERSIZED  
MOTION TO DISMISS CERTAIN CLAIMS IN LOEVY & LOEVY PLAINTIFFS'  
COMPLAINTS (UNOPPOSED)**

NOW COME Defendants, City of Chicago (the “City”), Phillip Cline, Terry Hillard, Dana Starks, Debra Kirby, and Karen Rowan (“Supervisory Officials”), Edward Griffin, John Griffin and Jerrold Bosak, and Brian Bolton, Miguel Cabrales, Darryl Edwards, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Jr., Calvin Ridgell Jr., Elsworth J. Smith, Jr., Kenneth Young, David Soltis, John Rodriguez, Lamonica Lewis, Rebecca Bogard, Frankie Lane, Katherine Moses-Hughes, Nobel Williams, Michael Spaargaren, Gerome Summers, Jr., Matthew Cadman, Kallat Mohammed, and Ronald Watts (“Defendant Officers”) (collectively “Defendants”), through their respective undersigned counsel, and respectfully request leave to file their oversized Motion to Dismiss Certain Claims in Loevy and Loevy Plaintiffs’ Complaints. In support of this motion, Defendants state as follows:

1. Defendants' motion to dismiss certain claims is due December 11, 2020.
2. The motion, jointly filed on behalf of the above-listed defendants, is 23 pages in length. As such, the motion exceeds the page limit allowed by local rules without leave of court.
3. Defendants require the additional pages in order to properly address the multiple and complex legal issues raised in the motion.

4. It is in the interest of justice to allow Defendants the additional pages because it allows substantive issues to be presented to the Court in a full and clear manner.

5. Accordingly, Defendants hereby request leave to file a 23-page Motion to Dismiss Certain Claims in the Loevy and Loevy Plaintiffs' Complaints.

6. A copy of Defendants' Motion is attached hereto as Exhibit 1.

7. The Loevy and Loevy Plaintiffs have no opposition to the relief requested in this motion.

WHEREFORE, Defendants respectfully request an order granting their motion for leave to file their oversized Motion to Dismiss Certain Claims in the Loevy and Loevy Plaintiffs' Complaints.

Dated: December 11, 2020

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I, Amy A. Hijjawi, an attorney, hereby certify that, on the date stamped on the margin above, I caused to be filed with the Clerk of the Court's CM/ECF system a copy of this motion, which simultaneously served copies on all counsel of record via electronic notification.

/s/ Amy A. Hijjawi \_\_\_\_\_