

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

Germin Sims and Robert Lindsey,)	
)	
<i>Plaintiff,</i>)	Case No. 19 CV 2347
)	
v.)	
)	
City of Chicago, Ronald Watts, Phillip Cline,)	Honorable Rebecca R. Pallmeyer
Debra Kirby, Brian Bolton, Robert Gonzalez,)	
Alvin Jones, Manuel Leano, Kallatt)	
Mohammed, Douglas Nichols Jr., and)	
Elsworth Smith Jr.,)	
)	
<i>Defendants.</i>)	

**CERTAIN DEFENDANTS' MOTION FOR LEAVE TO FILE OVERSIZED BRIEF IN
SUPPORT OF THEIR MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

NOW COME Certain Defendants Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols Jr., and Elsworth Smith Jr., and submit their unopposed motion for leave to file an oversized brief in support of their motion for summary judgment as follows:

1. Certain Defendants' Motion for summary judge is due to be filed June 2, 2025. Dkt. 106.
2. Plaintiffs filed a 16-page Complaint, consisting of 72 paragraphs, containing multiple claims, against multiple defendants, based on multiple legal theories. Dkt. 1.
3. Certain Defendants respectfully submit that their oversized memorandum of law, which consists of 28 pages, is warranted due to the number and complexity of the legal issues. Certain Defendants' motion for summary judgment is attached as Exhibit A.
4. Counsel for Certain Defendants has conferred with Plaintiffs' counsel regarding this motion. Plaintiffs' counsel indicated the motion could be presented as unopposed as long as counsel is granted the same number of excess pages for his response (which Certain Defendants' do not oppose).

WHEREFORE, Certain Defendants respectfully request leave to file their oversized brief in support of their motion for summary judgment, as well as any other relief this Court deems appropriate.

Respectfully submitted,

/s/ Jason Marx

Special Assistant Corporation Counsel for Certain Defendants

Andrew Hale
Amy Hijjawi
Jason Marx
Kelly Olivier
Anthony Zecchin
Jennifer Bitoy
Hannah Beswick-Hale
Dylan Burdelik
Michelle Heyman-Kantor
Mary Johnston
HALE & MONICO, LLC
53 W. Jackson Blvd, Suite 334
Chicago, IL 60604
(312) 870-6912
jmarx@halemonico.com
Attorney No. 6279266

CERTIFICATE OF SERVICE

I hereby certify that on June 2, 2025, I electronically filed the foregoing Motion with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to all counsel of record.

/s/ Jason Marx