

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

Germin Sims and Robert Lindsey,

Plaintiffs,

V.

City of Chicago, Ronald Watts,  
Phillip Cline, Debra Kirby, Brian  
Bolton, Robert Gonzalez, Alvin  
Jones, Manuel Leano, Lamonica  
Lewis, Kallatt Mohammed,  
Douglas Nichols Jr., and Elsworth Smith Jr.,  
Defendants.

Case No. 19-cv-2347

Hon. Rebecca Pallmeyer

**DEFENDANT KALLATT MOHAMMED’S MOTION TO JOIN PORTIONS OF  
CO-DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT (UNOPPOSED)**

Defendant, Kallatt Mohammed, by his attorneys, Special Assistant Corporation Counsel Eric S. Palles, Sean M. Sullivan and Rachel E. Johnson of Mohan, Groble & Scolaro, P.C. respectfully moves for leave to join in and adopt portions of his co-defendants' motion for summary judgment [Dkt. 128], filed pursuant to Federal Rule of Civil Procedure 56. In support of his notice, Defendant Mohamme states as follows:

1. Defendant Mohammed is a former Chicago police officer. He is one of many defendants sued by Plaintiffs for alleged misconduct that occurred when they were arrested on October 15, 2009. Plaintiffs claim, generally, that each of the defendants, including Defendant Mohammed, violated his civil rights during these arrests and the subsequent prosecutions.

2. Defendant Mohammed is entitled to summary judgment, for the reasons set forth in sections I, II and III of his co-defendants' Motion for Summary Judgment. [Dkt.128].

3. Defendant Mohammed hereby respectfully requests leave to join, adopt, and incorporate the arguments and reasoning in these sections of his co-defendants' motion and memorandum. Defendant Mohammed also seeks to join, adopt, and incorporate the Undisputed Facts [Dkt.121] cited by his co-defendants in support of these arguments in their motion.

4. This notice is being given in the interest of judicial efficiency. No party is or will be prejudiced by the granting of this request.

5. On June 1, 2025, counsel for Mohammed and Plaintiff conferred, and Plaintiff's counsel indicated that Plaintiff does not oppose this joinder.

WHEREFORE, Defendant Kallatt Mohammed seeks leave to, and hereby gives notice of an intent, to join the above referenced portions of the summary judgment motion filed by Defendants [Dkt. 121, 128].

Respectfully submitted,

/s/ Eric S. Palles #2136473  
ERIC S. PALLES  
Special Assistant Corporation Counsel

Eric S. Palles  
Sean M. Sullivan  
Rachel E. Johnson  
Mohan Groble Scolaro, P.C.  
55 W. Monroe St., Suite 1600  
Chicago, IL 60603  
(312) 422-9999  
[epalles@mohangroble.com](mailto:epalles@mohangroble.com)  
[ssullivan@mohangroble.com](mailto:ssullivan@mohangroble.com)  
[rjohnson@mohangroble.com](mailto:rjohnson@mohangroble.com)  
*Counsel for Defendant Kallatt Mohammed*