

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

Germin Sims and Robert Lindsey,)	
)	
)	
Plaintiffs,)	Case No. 19-cv-2347
v.)	
)	
City of Chicago, Ronald Watts,)	Hon. Rebecca Pallmeyer
Phillip Cline, Debra Kirby, Brian)	
Bolton, Robert Gonzalez, Alvin)	
Jones, Manuel Leano, Lamonica)	
Lewis, Kallatt Mohammed,)	
Douglas Nichols Jr., and Elsworth Smith Jr.,)	
Defendants.)	

**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 Mohammed 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
ssullivan@mohangroble.com
rjohnson@mohangroble.com

Counsel for Defendant Kallatt Mohammed