

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

GERMIN SIMS)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 19-cv-2347
City of Chicago, Ronald Watts, Brian)	
Bolton, Robert Gonzalez, Alvin Jones,)	Honorable Rebecca R. Pallmeyer
Manuel Leano, Kallatt Mohammed, Douglas)	
Nichols Jr. and Elsworth Smith Jr.,)	Mag. Laura K. McNally
)	
<i>Defendants.</i>)	
)	

**DEFENDANT RONALD WATTS’
UNOPPOSED MOTION FOR LEAVE TO JOIN PORTIONS OF
CO-DEFENDANTS’ MOTION FOR SUMMARY JUDGMENT**

Defendant, Ronald Watts, by his attorneys, Special Assistant Corporation Counsel Brian P. Gainer and Lisa M. McElroy of Johnson & Bell, Ltd., moves this Honorable Court for leave to join and adopt portions of his co-defendants’ motions for summary judgment [Dkt. 121, 128], filed pursuant to Federal Rule of Civil Procedure 56. In support of his motion for leave, Defendant Watts states as follows:

1. Defendant Watts is a former Sergeant of the Chicago police department. He is one of many defendants sued by Plaintiffs for alleged misconduct that occurred when Plaintiffs were arrested on October 15, 2009. Plaintiff claims, generally, that each of the defendants, including Defendant Watts, violated his civil rights and Illinois law in various ways during his arrest and the subsequent prosecutions.

2. Defendant Watts is entitled to summary judgment for the reasons set forth in sections I (pp. 3-6); II (pp. 6-16), and III (pp. 16-17) of his co-defendants’ Motion for Summary Judgment. [Dkt. 128].

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

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

5. On June 17, 2025, counsel for Watts and Plaintiff conferred, and Plaintiff's counsel indicated that Plaintiff does not object to this request.

Defendant Ronald Watts respectfully requests that this Honorable Court grant him leave to join the above referenced portions of the summary judgment motion filed by Defendants Bolton, Nichols, Gonzalez, Leano, Smith, and Jones [Dkt. 121, 128], or for any other relief that this Honorable Court deems equitable and just.

Respectfully submitted,

/s/ Brian P. Gainer

Special Assistant Corporation Counsel

Brian P. Gainer
Lisa M. McElroy
Johnson & Bell, Ltd.
33 W. Monroe St., Suite 2700
Chicago, IL 60603
Counsel for Defendant Ronald Watts

CERTIFICATE OF SERVICE

The undersigned on oath certifies that he served **Defendant Ronald Watts' Motion for Leave to Join Certain Portions of His Co-Defendants' Motion for Summary Judgment** to all counsel of record, via electronic filing, on **June 17, 2025**.

/s/ Brian P. Gainer

Special Assistant Corporation Counsel

Brian P. Gainer
Lisa M. McElroy
Johnson & Bell, Ltd.
33 W. Monroe St., Suite 2700
Chicago, IL 60603
(312) 372-0770
Counsel for Defendant Ronald Watts