

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

|                                 |                              |
|---------------------------------|------------------------------|
| GERMIN SIMS AND ROBERT LINDSEY, | )                            |
|                                 | )                            |
| Plaintiff,                      | )                            |
|                                 | )                            |
| v.                              | ) Case No. 19 C 2347         |
|                                 | )                            |
| CITY OF CHICAGO, RONALD WATTS,  | ) Judge Rebecca R. Pallmeyer |
| BRIAN BOLTON, ROBERT GONZALEZ,  | )                            |
| ALVIN JONES, MANUEL LEANO,      | )                            |
| KALLATT MOHAMMED, DOUGLAS       | )                            |
| NICHOLS JR., AND ELSWORTH SMITH | )                            |
| JR.,                            | )                            |
|                                 | )                            |
| Defendants.                     | )                            |

**STIPULATION TO DISMISS**

IT IS HEREBY STIPULATED AND AGREED by and between the parties hereto, by their respective attorneys of record, that this matter has been settled by the parties and, therefore, all claims related to this cause should be dismissed without prejudice, to be automatically converted to dismissal with prejudice on June 15, 2026, unless a party has moved to extend that date prior to June 15, 2026. Each side shall bear its own costs and attorneys' fees.

Respectfully submitted,

s/ Joel A. Flaxman

Kenneth N. Flaxman

Joel A. Flaxman

Attorneys for Plaintiffs, *Germin Sims and Robert Lindsey*

Law Offices of Kenneth N. Flaxman  
200 S. Michigan Ave., Suite 201  
Chicago, IL 60604  
(312) 427-3200  
DATE: November 11, 2025

CITY OF CHICAGO a Municipal Corporation

Mary B. Richardson-Lowry

Corporation Counsel

BY: s/ Victoria R. Benson

Victoria R. Benson

Deputy Corporation Counsel  
121 North LaSalle Street, Room 600  
Chicago, Illinois 60602  
(312) 744-1015  
DATE: November 11, 2025

s/ Paul A. Michalik

Terrence M. Burns

Paul A. Michalik  
Daniel M. Noland  
Attorneys for Defendant, *City of Chicago*  
Special Assistant Corporation Counsel  
Burns Noland LLP  
311 S. Wacker Drive, Suite 5200  
Chicago, Illinois 60606  
(312) 982-0090  
DATE: November 11, 2025

s/ Brian P. Gainer  
Brian P. Gainer  
Lisa M. McElroy  
Attorneys for Defendant, *Ronald Watts*  
Special Assistant Corporation Counsel  
Johnson & Bell, Ltd.  
33 W. Monroe Street, Suite 2700  
Chicago, Illinois 60603  
(312) 372-0770  
DATE: November 11, 2025

s/ Eric S. Palles  
Eric S. Palles  
Sean M. Sullivan  
Attorneys for Defendant, *Kallat Mohammed*  
Special Assistant Corporation Counsel  
Mohan Groble Scolaro P.C.  
55 W. Monroe Street, Suite 1600  
Chicago, Illinois 60603  
(312) 422-9999  
DATE: November 11, 2025

s/ Kelly Olivier  
Andrew M. Hale  
Kelly Olivier  
Jason Marx  
Attorneys for Defendants, *Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, Douglas Nichols, Jr., and Elsworth Smith, Jr.*  
Special Assistant Corporation Counsel  
Hale & Monico, LLC  
53 W. Jackson, Suite 337  
Chicago, Illinois 60604  
(312) 341-9646  
DATE: November 11, 2025