

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

Germin Sims and Robert Lindsey,)	
)	
<i>Plaintiff</i>)	19-cv-2347
)	
-vs-)	(Judge Pallmeyer)
)	
City of Chicago, et al.,)	
)	
<i>Defendants</i>)	

JOINT MOTION TO AMEND SETTLEMENT REFERRAL

Plaintiffs and defendant City of Chicago, by counsel, respectfully request that the Court amend the settlement referral to refer this matter to Magistrate Judge Valdez.

Grounds for this motion are as follows:

1. On October 23, 2024, with the agreement of the parties, this Court entered a settlement referral to the calendar of Magistrate Judge Sheila M. Finnegan. (ECF No. 83.)
2. At that time, Magistrate Judge Finnegan was the assigned magistrate for discovery and settlement negotiations in *In re Watts Coordinated Proceedings*, 19-cv-1717.
3. The Coordinated Proceedings terminated on December 2, 2024. (ECF No. 827 in 19-cv-1717.)
4. Magistrate Judge Finnegan's calendar, upon her retirement, was assigned Magistrate Judge McNally.

5. On January 21, 2025, the Executive Committee entered a referral in the Coordinated Proceedings to the calendar of Magistrate Judge Valdez for the purpose of holding global settlement negotiations. (ECF No. 842 in 19-cv-1717.)

6. Magistrate Judge Valdez has been successfully conducting settlement conferences in a number of cases from the Coordinated Proceedings and is familiar with the issues and history of negotiations.

7. Accordingly, the parties agree that a referral of this case to Magistrate Judge Valdez, to be a part of the global settlement negotiations, would assist the parties in their negotiations.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
attorneys for plaintiff

/s/ Paul A. Michalik (by consent)
Daniel M. Noland
Terrence M. Burns
Paul A. Michalik
Katherine C. Morrison
Daniel J. Burns
Dhaviella N. Harris
Burns Noland LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
(312) 982-0090
*attorneys for defendants City of
Chicago, Philip Cline, and Debra Kirby*