

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

TERRENCE MOYE,)	
)	
Plaintiff,)	
)	
v.)	Case No. 20-cv-1897
)	
CITY OF CHICAGO, RONALD)	
WATTS, PHILLIP CLINE, DEBRA)	
KIRBY, BRIAN BOLTON, ROBERT)	
GONZALEZ, ALVIN JONES, MANUEL)	
LEANO, KALLATT MOHAMMED,)	
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 Plaintiff, *Terrence Moye*
Law Offices of Kenneth N. Flaxman
200 S. Michigan Ave., Suite 201
Chicago, IL 60604
(312) 427-3200
DATE: November 17, 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 17, 2025

s/ Terrence M. Burns

Terrence M. Burns

Paul A. Michalik
Daniel M. Noland
Attorneys for Defendants, *City of Chicago, Philip Cline, and Debra Kirby*
Special Assistant Corporation Counsel
Burns Noland LLP
311 S. Wacker Drive, Suite 5200
Chicago, Illinois 60606
(312) 982-0090
DATE: November 17, 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 17, 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 17, 2025

s/ Jason Marx
Andrew M. Hale
Kelly Olivier
Jason Marx
Attorneys for Defendants, *Brian Bolton, Robert Gonzalez, Alvin Jones, Manuel Leano, and Elsworth Smith, Jr.*
Special Assistant Corporation Counsel
Hale & Monico, LLC
53 W. Jackson, Suite 337
Chicago, Illinois 60604
(312) 341-9646
DATE: November 17, 2025