

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

DENNIS JACKSON,)
Plaintiff,)
v.) No. 1:22-cv-04337
CITY OF CHICAGO, PATRICK BOYLE,) Honorable Jorge L. Alonso
JENNIFER BURMISTRZ, EFRAIN CARRENO,)
MATTHEW EVANS, JOHN FOERTSCH,)
EDWARD GARCIA, MICHAEL HIGGINS,)
GERALD LAU, and JEFFREY LAWSON,)
Defendants.

**DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW
THEIR MOTION FOR LEAVE TO FILE AN AMENDED ANSWER**

Defendants, Patrick Boyle, Jennifer Burmistrz, Efrain Carreno, Matthew Evans, John Foertsch, Edward Garcia, Michael Higgins, Gerald Lau, Jeffrey Lawson, and the City of Chicago, by and through one of their attorneys, Jordan F. Yurchich, Assistant Corporation Counsel Supervisor, move to withdraw their motion for leave to file an amended answer to plaintiff's complaint (ECF No. 64). In support of this motion, defendants state as follows:

1. On March 25, 2024, defendants filed an opposed motion for leave to file an amended answer to plaintiff's complaint. (See ECF No. 64). More specifically, we sought leave to include an affirmative defense that plaintiff's Fourth Amendment claim for unlawful pretrial detention is barred by the two-year statute of limitations. (See ECF No. 64-1.)

2. The next day, on March 26, 2024, plaintiff sent a letter to defendants, which set forth his position regarding the merits of a statute of limitations defense.

3. On April 2, 2024, defendants advised plaintiff that, upon further reflection, we would like to file an amended motion for summary judgment changing the section dealing with the statute of limitations and that we would also withdraw our motion for leave to file an amended answer. Plaintiff responded later that same day, stating that he does not object to defendants filing an amended motion for summary judgment or withdrawing our motion for leave to file an amended answer.

WHEREFORE, defendants respectfully request that this court grant their request to withdraw their motion for leave to file an amended answer to the plaintiff's complaint and for any other relief this court deems equitable and jury.

DATED: April 8, 2024

Respectfully submitted,

BY: /s/ Jordan F. Yurchich
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CERTIFICATE OF SERVICE

I hereby certify that, on **April 8, 2024**, I submitted with the Clerk for the Northern District of Illinois using the Court's electronic filing system or CM/ECF **Defendants' Unopposed Motion to Withdraw their Motion for Leave to File an Amended Answer**, and thereby provided a copy of same by service to all attorneys of record.

/s/ Jordan F. Yurchich
JORDAN F. YURCHICH
Assistant Corporation Counsel Supervisor