

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

WILLIE ROBERSON, JR.,)
)
Plaintiff,)
)
v.) Case No. 22-cv-6050
)
CITY OF CHICAGO, Former CHICAGO) Judge Edmond E. Chang
POLICE SERGEANT RONALD WATTS,)
SERGEANT ALVIN JONES, OFFICER)
ELSWORTH SMITH JR., PHILIP CLINE,)
DEBRA KIRBY, KAREN ROWAN, and other)
as-yet-unidentified officers of the Chicago)
Police Department,)
)
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, *Willie Roberson, Jr.*

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/ Terrence M. Burns

Terrence M. Burns

Paul A. Michalik

Daniel M. Noland

Attorneys for Defendants, *City of Chicago, Philip Cline, Debra Kirby, and Karen Rowan*
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/ Jason Marx

Andrew M. Hale

Kelly Olivier

Jason Marx

Attorneys for Defendants, *Alvin Jones 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