

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

CHARLES JOHNSON,)
Plaintiff,)
v.) Case No. 22-cv-6396
CITY OF CHICAGO, PHILIP CLINE,) Judge Franklin U. Vasquez
DEBRA KIRBY, RONALD WATTS, BRIAN)
BOLTON, MIGUEL CABRALES, ROBERT) Magistrate Judge Alberto E. Diaz
GONZALEZ, 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 Plaintiff, *Charles Johnson*
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

121 North LaSalle Street, Room 600
Chicago, Illinois 60602
(312) 744-1015

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/ Jason Marx

Andrew M. Hale
Kelly Olivier
Jason Marx
Attorneys for Defendants, *Brian Bolton, Miguel Cabrales, Robert Gonzalez, 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 17, 2025