

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

VONDELL WILBOURN, individually and for)	
others similarly situated,)	
)	
<i>Plaintiff,</i>)	
)	Case No. 23-cv-1782
-vs-)	
)	Honorable Manish S. Shah
SHERIFF OF COOK COUNTY and)	Magistrate Judge Young B. Kim
COOK COUNTY, ILLINOIS,)	
)	
<i>Defendants.</i>)	

**DEFENDANTS’ NOTICE OF CORRECTION REGARDING
REPLY BRIEF IN SUPPORT OF MOTION TO DISMISS [DKT. 23]**

Defendants, SHERIFF OF COOK COUNTY and COOK COUNTY, ILLINOIS, by their attorney KIMBERLY M. FOXX, State’s Attorney of Cook County, through her Special Assistant State’s Attorneys, JOHNSON & BELL, LTD., make the following correction in Defendants’ reply brief in support of their motion to dismiss Plaintiff’s amended complaint:

The statement at page 12, lines 5-6 of “Defendant’s Reply in Support of Motion to Dismiss Plaintiff’s Amended Complaint” which was filed as ECF No. 23 is hereby corrected to insert the underlined text:

As Plaintiff alleges, the prosecutor made the following proffer:
“[t]here were four incidents ... that were violations of the EM
program.” (Am. Compl. ¶ 21.)

Respectfully Submitted,

KIMBERLY M. FOXX
State’s Attorney of Cook County

Dated: September 12, 2023

/s/ Samuel D. Branum
Special Assistant State’s Attorney

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