

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

**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

Monica Burkoth ([burkothm@jbltd.com](mailto:burkothm@jbltd.com))  
Samuel D. Branum ([branums@jbltd.com](mailto:branums@jbltd.com))  
JOHNSON & BELL, LTD.  
33 W. Monroe, Ste. 2700  
Chicago, IL 60603  
(312) 372-0770