

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

Alexander Gray,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 23-cv-1931
)	
City of Evanston, Evanston Police)	
Officers Kubiak, Kane, Popp,)	
Rosenbaum, and Pogorzelski,)	<i>(Judge Seeger)</i>
)	
<i>Defendants.</i>)	

MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff, by counsel, moves the Court to grant summary judgment against all defendants and in favor of plaintiff on liability.

As explained in the supporting memorandum, an Evanston police report, Evanston's written policies, and videos from body-worn cameras show that plaintiff was subjected to excessive force and was unreasonably searched, and that the individual defendants and the City of Evanston are liable for plaintiff's constitutional injuries.

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
ARDC No. 08830399
Joel A. Flaxman
200 South Michigan Ave Ste 201
Chicago, Illinois 60604
(312) 427-3200
Attorneys for Plaintiffs