

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

MADELINE MENDOZA, )  
                          )  
                          )  
                          *Plaintiff*, )  
                          )  
                          ) No. 23-cv-2441  
-vs-                  )  
                          )  
                          *Judge Durkin*)  
REYNALDO GUEVARA, *et al.*, )  
                          )  
                          )  
                          *Defendants*. )

MARILYN MULERO, )  
                          )  
                          )  
                          *Plaintiff*, )  
                          )  
                          ) No. 23-cv-4795  
-vs-                  )  
                          )  
                          *Judge Durkin*)  
REYNALDO GUEVARA, *et al.*, )  
                          )  
                          )  
                          *Defendants*. )

**DEFENDANTS' SUBMISSION OF RELEVANT  
PORTIONS OF JACQUELINE MONTANEZ STATEMENTS**

NOW COME Defendants, by and through their undersigned attorneys, and submit this supplemental brief regarding the testimony of Jacqueline Montanez, state as follows:

1. This Court ordered the production of relevant portions of the deposition of Jacqueline Montanez relating to communications she had with two third parties, Adolfo Davis and Cassandra Geer, as intermediaries with Plaintiffs Mulero and Mendoza.
2. The relevant portions of this deposition are attached hereto as Exhibit A.
3. Additionally, for context, Defendants have attached the relevant portions of the depositions of Plaintiff Mendoza and Mulero wherein they deny having had such communications. *See Ex. B-C.* Thus, Defendants' position is that the depositions of these individuals are important both

in establishing the underlying nature and purpose for the communication with Ms. Montanez via these intermediaries as well as for the purposes of impeachment of Plaintiffs.

4. Ms. Montanez also made statements on a publicly available video podcast suggesting that there were discussions with Plaintiffs regarding compensation or “help” being provided to Ms. Montanez because of Ms. Montanez’s role in Plaintiffs being released from prison. *See* Ex. D.

Respectfully submitted,

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