

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

MADELINE MENDOZA,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	23 CV 2441
	)	
CITY OF CHICAGO, REYNALDO	)	
GUEVARA, GERI LYNN YANOW, as	)	District Judge Thomas M. Durkin
Special Representative for ERNEST	)	Magistrate Judge Young B. Kim
HALVORSEN, STEPHEN GAWRYS, and	)	
ANTHONY RICCIO,	)	
	)	
Defendants.	)	

MARILYN MULERO,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	23 CV 4795
	)	
REYNALDO GUEVARA; GERI LYNN	)	
YANOW, as Special Representative for	)	District Judge Thomas M. Durkin
The Estate of ERNEST HALVORSEN;	)	Magistrate Judge Young B. Kim
STEPHEN GAWRYS; ANTHONY	)	
RICCO; ROBERT BIEBEL; and CITY	)	
OF CHICAGO, a municipal corporation,	)	
	)	
Defendants.	)	

**JOINT MOTION FOR ENTRY OF AGREED
CONFIDENTIALITY PROTECTIVE ORDER**

NOW COMES Defendants, the City of Chicago, Reynaldo Guevara, Geri Lynn Yanow, as Special Representative for Ernest Halvorsen, deceased, Stephen Gawrys, Anthony Riccio, and Robert Biebel, and Plaintiffs Marilyn Mulero and Madeline Mendoza (hereinafter referred to as the “Parties”), by and through their respective undersigned counsel, and jointly move for entry of

a confidentiality protective order. In support thereof, the parties state:

1. The Parties agree that a confidentiality protective order needs to be entered in these consolidated cases.

2. On May 7, 2024, in *Munoz v. Guevara*, 23-CV-3210, this Court entered an Order on Defendants' Motion for Entry of Confidentiality Protective Order, granting it in part and denying it in part. (*Munoz* Dkt. 116).

3. To conserve judicial resources, the parties have agreed to entry of the same Confidentiality Protective Order that the Court entered in *Munoz* (*Munoz* Dkt. 117).

4. Thus, the parties agree that the Confidentiality Protective Order attached hereto as Exhibit A, which is the same order entered in *Munoz* with the exception of the caption of the case, be entered in this case.

WHEREFORE, all parties respectfully request this Honorable Court grant their Joint Motion for Entry of Confidentiality Protective Order, and for all other relief deemed equitable and just.

Dated: August 22, 2023

Respectfully Submitted,

/s/ John Timbo
JOHN TIMBO
One of the Attorneys for Defendants
Riccio, Gawrys, Biebel, and Halvorsen

/s/ Austin G. Rahe
AUSTIN G. RAHE
One of the Attorneys for the City of Chicago

James G. Sotos
Josh M. Engquist
Joseph M. Polick
John Timbo
Elizabeth Fleming
Thomas J. Sotos
THE SOTOS LAW FIRM, P.C.
141 W. Jackson Blvd, Suite 1240A
Chicago, IL 60604
(630) 735-3300

Eileen E. Rosen
Theresa Carney
Catherine Barber
Austin Rahe
Andrew Grill
Lauren Ferrise
Rock Fusco & Connelly, LLC
333 W. Wacker Drive, 19th Floor
Chicago, IL 60606
(312)494-1000
arahe@rfclaw.com

jtimbo@jsotoslaw.com

/s/ Emily E. Schnidt

EMILY E. SCHNIDT

One of the Attorneys for Reynaldo Guevara

Steven B. Borkan
Timothy Scahill
Emily E. Schnidt
Whitney Hutchinson
Borkan & Scahill, Ltd
20 S. Clark Street, Suite 1700
Chicago, IL 60603
(312)580-1030
sborkan@borkanscahill.com
tscahill@borkanscahill.com
eschnidt@borkanscahill.com
whutchinson@borkanscahill.com

/s/ Carter Grant

Steven A. Hart
Brian Eldridge
Carter Grant
John Marrese
Hart McLaughlin & Eldridge, LLC
One South Dearborn St., Suite 1400
Chicago, Illinois 60603
(312) 955-0545
shart@mnelegal.com
beldridge@hmelegal.com
cgrant@hmelegal.com
jmarrese@mnelegal.com

Antonio M. Romanucci
Bhavani Ravendran
Sam Harton
Patrick Discoll
Romanucci & Blandin, LLC
321 N. Clark Street, Suite 900
Chicago, Illinois 60654
(312) 458-1000
aromanucci@rblaw.net
b.raveendran@rblaw.net
sharton@rblaw.net
pdriscoll@rblaw.net
Attorneys for Plaintiff Mulero

/s/ Joel A. Flaxman

Joel A. Flaxman
Kenneth N. Flaxman
200 S. Michigan Ave., Suite 201
Chicago, Illinois 60604-2430
(312) 427-3200
jaf@kenlaw.com
knf@kenlaw.com
Attorneys for Plaintiff Mendoza