

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

JOSE TINAJERO,)
Plaintiff,) Case No. 24-cv-1598
v.) Honorable Judge John F. Kness
REYNALDO GUEVARA, *et al.*,)
Defendants.)

MOTION FOR LEAVE TO WITHDRAW APPEARANCE

Defendant, City of Chicago, by and through its attorneys Rock Fusco & Connelly, LLC, hereby moves for leave to withdraw the appearance of Kelly A. Krauchun as its counsel, stating:

1. Kelly A. Krauchun filed her appearance as an attorney for the Defendant, City of Chicago, on September 24, 2024. *See* ECF No. 93.
2. Kelly A. Krauchun is no longer an attorney at Rock Fusco & Connelly, LLC.
3. Eileen E. Rosen, Theresa B. Carney, Catherine M. Barber, Austin G. Rahe, Lauren M. Ferrise, Sabrina A. Scardamaglia, Andrew J. Grill and Martin W. McManaman will remain as counsel for the Defendant, City of Chicago.

WHEREFORE, Defendant, City of Chicago, respectfully requests that this Honorable Court grant its Motion and enter an order withdrawing Kelly A. Krauchun's appearance as its counsel in this matter, and for any other relief it deems just.

Dated: June 25, 2025

Respectfully submitted,

By:/s/ *Eileen E. Rosen*
Special Assistant Corporation Counsel
For Defendant City of Chicago

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