

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

LIMORRIS BELL, )  
v. Plaintiff, )  
CITY OF CHICAGO et al., )  
Defendants. )  
Case No. 25-cv-09679  
Honorable April M. Perry

**DEFENDANTS' MOTION  
FOR LEAVE TO WITHDRAW AND SUBSTITUTE ATTORNEYS**

Defendants, Crystina Kittrell and Richard Rodriguez, Jr., respectfully move this Honorable Court to allow the withdrawal of David Condron, Corporation Counsel for the City of Chicago, as their attorneys, and to substitute Brian P. Gainer, Lisa M. McElroy, and Jack A. Gainer, of the law firm of JOHNSON & BELL, LTD., as their attorneys. Counsel from Johnson & Bell Ltd., has spoken with ACC David Condron concerning this motion, and he consents to same.

Dated: December 22, 2025

Respectfully submitted,

*/s/Brian P. Gainer*

Attorney for Defendant Rodriguez

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## **SUBSTITUTION OF ATTORNEYS**

David Condon, Corporation Counsel for the City of Chicago, hereby withdraws as counsel on behalf of Defendants, Crystina Kittrell and Ofc. Richard Rodriguez Jr., in the above-captioned cause, and consents to a substitution.

By: /s/ David Condron  
David Condron, Assistant Corporation Counsel  
for the City of Chicago

JOHNSON & BELL, LTD., hereby enters their substitution of counsel on behalf of Defendants, Crystina Kittrell and Richard Rodriguez Jr., in the above-captioned cause, in lieu of David Condon, Corporation Counsel for the City of Chicago, whose appearance is hereby withdrawn.

BY: /s/ Brian P. Gainer  
JOHNSON & BELL, LTD.

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