

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

ANDRE REDMOND,)	
)	
Plaintiff,)	No. 06 C 3611
)	
vs.)	Judge Der-Yeghiayan
)	Magistrate Judge Keys
CITY OF CHICAGO, et al.,)	
)	
Defendants.)	

**AGREED MOTION FOR
ENTRY OF JUDGMENT**

Plaintiff Andre Redmond, through counsel, Law Offices of Lawrence V. Jackowiak, respectfully requests that this Honorable Court enter judgment in the amount of \$191,943.55 for Plaintiff’s attorneys’ fees. In support thereof, Plaintiff states as follows:

1. This motion is agreed.
2. On March 4, 2008, the jury returned a verdict in favor of Plaintiff. On March 5, 2008, judgment was entered on the verdict in the amount of \$40,500.
3. On April 3, 2008, Plaintiff filed a Bill of Costs.
4. On May 16, 2008, the Court entered judgment on the bill of costs in the amount of \$3,152.43.
5. On November 11, 2008, Plaintiff filed a motion for attorneys’ fees.
6. Shortly thereafter, the parties entered into settlement negotiations regarding attorneys’ fees.
7. Plaintiff’s motion for attorneys’ fees was stricken with leave to reinstate on January 21, 2009, pending the outcome of settlement negotiations.
8. The parties have reached a settlement on the issue of attorneys’ fees and have agreed that an award of \$191,943.55 is a fair and reasonable sum for Plaintiff’s attorneys’ fees.

Wherefore, Plaintiff respectfully requests that this Honorable Court enter judgment in the amount of \$191,943.55 for Plaintiff’s attorneys’ fees.

Respectfully submitted,

/s/ Lawrence V. Jackowiak
Counsel for the Plaintiff

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