

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

<b>CINCINNATI INSURANCE</b>	)	
<b>COMPANY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>No. 11-cv-02055</b>
	)	<b>Hon. Joan H. Lefkow</b>
<b>BLUE CAB COMPANY, INC. and</b>	)	
<b>ROSE M. WASHINGTON-SANDERS,</b>	)	
	)	
<b>Defendants.</b>	)	

**MOTION OF CINCINNATI INSURANCE COMPANY  
FOR ENTRY OF JUDGMENT IN ITS FAVOR**

Plaintiff, Cincinnati Insurance Company (“Cincinnati”), by its counsel, hereby moves for entry of judgment in its favor. In support thereof, Cincinnati states as follows:

1. This is an insurance coverage dispute arising from an auto accident. Rose Washington-Sanders (“Ms. Sanders”) settled her underlying lawsuit against Blue Cab Company in July 2013. As part of that settlement, Blue Cab assigned to Ms. Sanders any right for insurance coverage from Cincinnati in relation to the lawsuit.

2. Ms. Sanders moved for summary judgment in this matter on her claim for payment of \$1 million from Cincinnati. (ECF no. 63).

3. By Order dated May 9, 2014, this Court denied Ms. Sanders’ motion, ruled that Cincinnati owes nothing to Ms. Sanders, and directed Cincinnati to move for judgment. (ECF no. 76).

4. For the reasons set forth in this Court’s Opinion and Order of May 9, 2014, Cincinnati moves for entry of judgment in its favor and against Ms. Sanders and Blue Cab Company.

WHEREFORE, Plaintiff Cincinnati requests that this motion be granted and the Court enter an order:

- A. Entering judgment in favor of Cincinnati Insurance Company and against Rose Washington-Sanders and Blue Cab Company;
- B. Granting other such relief allowed in law and equity that the Court deems appropriate and just.

CINCINNATI INSURANCE COMPANY

/S/ Hope G. Nightingale \_\_\_\_\_  
By One of Its Attorneys

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(312) 781-6630 Fax

WHEREFORE, Plaintiff Cincinnati requests that this motion be granted and the Court enter an order:

- A. Entering judgment in favor of Cincinnati Insurance Company and against Rose Washington-Sanders and Blue Cab Company;
- B. Granting other such relief allowed in law and equity that the Court deems appropriate and just.

Dated: May 13, 2014

CINCINNATI INSURANCE COMPANY

/S/ Hope G. Nightingale  
By One of Its Attorneys

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