

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

Maria I. Gatlin,)	
)	
Plaintiff,)	
)	Case No. 1:14-cv-03808
v.)	
)	
Village of Summit, and)	Judge Matthew F. Kennelly
Les Peterson in His Official and Individual)	
Capacities,)	
)	
Defendants.)	

MOTION FOR ENTRY OF FINAL JUDGMENT

Plaintiff, Maria Gatlin, by and through her attorneys, O’Connor | O’Connor, P.C., hereby moves this Court for Entry of Final Judgment as follows:


1. Plaintiff Maria Gatlin is entitled to \$79,846.51 as backpay damages payable by Defendant Village of Summit.
2. This Court declares that Defendant Village of Summit violated Plaintiff’s rights under the Americans with Disabilities Act, 42 U.S.C. §126, and the Illinois Human Rights Act, 775 ILCS 5/1-101 et seq., by failing to provide Plaintiff with a reasonable accommodation and by unlawfully terminating her employment.
3. This Court declares that Defendant Village of Summit and Defendant Les Peterson unlawfully deprived Plaintiff Maria Gatlin of her employment without affording her due process of law, in violation of her constitutional rights under the Fourteenth Amendment of the United States Constitution, and Article I, §2 of the Illinois State Constitution.

4. Defendants Village of Summit and Les Peterson will take any and all actions necessary in order to completely and officially correct the records of all applicable governmental and quasi-governmental entities, including its own records, which indicate that Plaintiff's employment with Summit was terminated, that Plaintiff was terminated "for cause," that Plaintiff abandoned her position, or which indicate anything contrary to the findings of this Court.
5. Defendant Village of Summit and Les Peterson will correct the records of all applicable governmental and quasi-governmental entities, including its own records, to indicate that Plaintiff Maria Gatlin retired from Defendant Village of Summit Police Department on August 18, 2013.
6. Defendants Village of Summit and Les Peterson will take any and all actions necessary in order to completely and officially correct the records of the Summit Police Pension Fund and Summit Police Pension Board which indicate that Plaintiff's employment with Summit was terminated, that Plaintiff was terminated "for cause," that Plaintiff abandoned her position, or which indicate anything contrary to the findings of this Court.
7. Defendants Village of Summit and Les Peterson will take any and all actions necessary in order to completely and officially correct the records of the Summit Police Pension Fund and Summit Police Pension Board to indicate that Plaintiff Maria Gatlin retired from Defendant Village of Summit Police Department on August 18, 2013.
8. To the extent necessary, Plaintiff will cooperate with Defendants so that Defendants can fully comply with this Order.

WHEREFORE, Plaintiff Maria Gatlin prays that this Honorable Court grant her Motion for Entry of Final Judgment.

Respectfully Submitted,

Maria Gatlin

By: 

Kevin F. O'Connor
One of Her Attorneys

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