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

KIERRA WILLIAMSON, PRINCETON )B. WILLIAMSON and MICHAEL C. )WILLIAMSON, )	
) Plaintiffs, )	No. 14 CV 6397
v. )	Judge Sharon Johnson Coleman
CHICAGO POLICE OFFICER ) WILFREDO ORTIZ, STAR NO. 9748, )	Magistrate Judge Finnegan
and the CITY OF CHICAGO,a municipal Corporation,	Jury Demand
) Defendants.	

## JOINT MOTION FOR ENTRY OF JUDGMENT FOR PLAINTIFFS' COSTS

Defendants Chicago Police Officer Wilfredo Ortiz, Star No. 9748 ("Officer Ortiz") and the City of Chicago (the "City"), and Plaintiffs Kierra Williamson, Princeton B. Williamson, and Michael C. Williamson ("Plaintiffs") (collectively the "Parties"), through their undersigned counsel, hereby move this Court for entry of the attached order awarding Plaintiffs' costs in this litigation. In support of their Motion, the Parties state as follows:

1. On March 11, 2015, Plaintiffs filed the above titled action against Officer Ortiz seeking relief for alleged excessive force and conspiracy after Officer Ortiz discharged his firearm in response to hearing shots fired on January 1, 2014, striking Plaintiffs. Plaintiffs sought a judgment against the City for damages caused by the alleged violation of Plaintiffs' rights by Officer Ortiz.

2. In their Complaint, Plaintiffs additionally brought a *Monell* claim, alleging that Officer Ortiz violated their constitutional rights as a result of the City's policies and practices of failing to investigate the use of deadly force by Chicago Police officers.

3. On September 8, 2017, trial commenced on Plaintiffs' claims. Ten day later on September 18, 2017, the jury returned a verdict in favor of the Plaintiffs against Officer Ortiz, awarding a total of \$4,250,000 in compensatory damages and \$500,000 in punitive damages to Plaintiffs.

4. The Parties have agreed to resolve Plaintiffs' attorneys' costs incurred to date in connection with the above captioned action.

5. Pursuant to that agreement, the Parties have agreed to entry of the attached order awarding Plaintiffs' costs in this action for the amount of sixty-one thousand (61,000) dollars.

WHEREFORE, Defendants Chicago Police Officer Wilfredo Ortiz, Star No. 9748, and the City of Chicago, and Plaintiffs Kierra Williamson, Princeton B. Williamson, and Michael C. Williamson respectfully requests that this Court enter the attached order awarding Plaintiffs' costs.

Dated: October 9, 2018

Respectfully submitted,

## /s/ Natalie Y. Adeeyo, Att. # 6323542

Shneur Z. Nathan Avi T. Kamionski Natalie Y. Adeeyo Nathan & Kamionski LLP 33 W. Monroe, Suite 1830 Chicago, IL 60603

Attorneys for Defendants

Jeffrey J. Neslund Law Offices of Jeffrey J. Neslund 20 N. Wacker Drive, Suite 3710 Chicago, IL 60606

Michael D. Robbins Michael D. Robbins & Associates 20 N. Wacker Drive, Suite 3710 Chicago, IL 60606

Robert Robertson Robertson Duric 1 N. LaSalle Street, Suite 300 Chicago, IL 60602

Attorneys for Plaintiffs

## **CERTIFICATE OF SERVICE**

I, Natalie Y. Adeeyo, an attorney, hereby certify that I filed the foregoing document with the Court's CM/ECF system on the date stamped on the above margin, which sent electronic copies of the same to all counsel of record.

/s/ Natalie Y. Adeeyo Natalie Y. Adeeyo