

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

M.A. by and through his parents MIGUEL)
AVILA, SR. and HERMINA AVILA,)
F.L. by and through his mother, JACQUETTA)
PEARSON, **Y.R.** by and through her mother)
CAROLINA BARRANCO, **H.S.** by and through)
his parents RICARDO SORIA and GEORGINA)
RIVERA, individually and on behalf of a class,)

No. 15-3116
Judge: Joan H. Lefkow
Magistrate: Sheila M. Finnegan

Plaintiffs,)

vs.)

PATRICIAL R. BELLOCK, in her official)
capacity as Director of the Illinois Department of)
Healthcare and Family Services,)

Defendant.)

AGREED MOTION FOR THE ENTRY OF JUDGMENT ORDER

Pursuant to the Settlement Agreement approved by this Court on December 18, 2018 (Dkt. # 159), Plaintiffs and Defendants respectfully move this Court to enter a Judgment Order for the payment of reasonable attorneys’ fees and costs incurred by Class Counsel, all in accordance with the express terms of the Decree.

Pursuant to paragraph 28 of the Settlement Agreement, the Defendant shall pay to Class Counsel the sum of \$550,000 in the manner set forth in written instructions provided by Class Counsel and agreed to by the Parties. The payment of \$550,000 shall be set forth in a Judgment Order to be entered by the Court.

Upon the filing of this Agreed Motion for the Entry of Judgment Order, Class Counsel will email to this Court, a proposed Judgment Order.

WHEREFORE, Plaintiffs and Defendant respectfully request that this Court enter the proposed Judgment Order providing for payment of attorneys' fees and costs in the total amount of \$550,000 (as more fully set forth in the proposed Judgment Order), reflecting the agreed upon distribution by the parties.

Dated: January 17, 2019

Respectfully submitted,

For Plaintiffs

For Defendant

By: /s/Robert H. Farley, Jr.

By: /s/ R. Douglas Rees

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CERTIFICATE OF SERVICE

I, Caroline G. Chapman, one of the Attorneys for the Plaintiffs', deposes and states that he caused the foregoing Agreed Motion for Entry of Judgment Order to be served by electronically filing said document with the Clerk of the Court using the CM/ECF system, this 17th day of January, 2019.

/s/ Caroline G. Chapman