

File No. 26524-KSP

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

KALISHA HILL, M.D.,)	
)	
Plaintiff,)	
)	Case No. 18-cv-00881
v.)	
)	Judge John Z. Lee
CONSULTANTS IN PATHOLOGY, S.C.)	
an Illinois medical corporation, and)	Magistrate Judge Sheila Finnegan
PATHOLOGY CONSULTANTS, INC.,)	
)	
Defendants.)	

**DEFENDANTS’ UNOPPOSED MOTION FOR ENTRY OF JUDGMENT
IN FAVOR OF DEFENDANTS**

Defendants, CONSULTANTS IN PATHOLOGY, S.C. (CIP) and PATHOLOGY CONSULTANTS, INC. (PCI), (collectively the “Defendants”), through their counsel, Kristine S. Phillips and Kate Kosartes of O’Hagan Meyer, move this Court for entry of judgment in favor of CIP and PCI pursuant to an arbitration award, and against Plaintiff KALISHA HILL, M.D. (“Plaintiff”), denying and dismissing Plaintiff’s First Amended Complaint At Law. In support of their motion, Defendants state as follows:

1. Plaintiff filed her initial complaint on February 2, 2018 against CIP and PCI alleging race discrimination under Section 1981 and retaliation under Title VII and Section 1981. (Doc. 1)
2. On March 26, 2018, Defendants moved to dismiss the complaint. (Docs. 8, 9, 11, 12).
3. On November 1, 2018, this Court issued a written memorandum opinion and order dismissing Plaintiff’s claims against PCI, with leave to replead. (Doc. 32). This Court

further stayed all claims against CIP, and compelled arbitration of those claims with the American Health Lawyers Association (“AHLA”) pursuant to the parties’ contract. (Doc. 32)

4. Plaintiff then filed her First Amended Complaint on November 6, 2018 against CIP and PCI again alleging race discrimination under Section 1981 and retaliation under Title VII and Section 1981. (Doc. 34)

5. Thereafter, PCI filed a motion to stay proceedings as the parties agreed to arbitrate their claims before the AHLA, along with the claims asserted against CIP (Doc. 38), which this Court granted (Doc. 40).

6. The parties proceeded to an arbitration hearing held June 10-14, 2019. An arbitration award was entered on October 29, 2019. Attached hereto as Exhibit A is a true and accurate copy of the AHLA arbitration award.

7. Specifically, the arbitrator found that Plaintiff failed to establish her claims of discrimination and retaliation asserted against both Defendants and as such, entered judgment in favor of Defendants.

8. Pursuant to the arbitration award, Defendants move this Court for entry of a judgment in favor of Defendants CIP and PCI and against Plaintiff, denying and dismissing Plaintiff’s First Amended Complaint.

9. Counsel for Plaintiff has no objection to this motion.

WHEREFORE, Defendants CONSULTANTS IN PATHOLOGY, S.C. and PATHOLOGY CONSULTANTS, INC. move this Court for entry of an order granting judgment in their favor and against Plaintiff KALISHA HILL, M.D. denying and dismissing Plaintiff’s First Amended Complaint at Law, and for any further relief this Court deems fair and just.

Date: November 1, 2019

Respectfully submitted:

CONSULTANTS IN PATHOLOGY, S.C.
and PATHOLOGY CONSULTANTS, INC.

By: /s/ Kristine S. Phillips
One of their attorneys
O'HAGAN MEYER LLC

Kristine S. Phillips
O'HAGAN MEYER LLC
One E. Wacker Dr., Suite 3400
Chicago, Illinois 60601
Telephone: 312.422.6100
Facsimile: 312.422.6110
kphillips@ohaganmeyer.com

CERTIFICATE OF SERVICE

This is to certify that on this 1st day of November 2019, I electronically filed the DEFENDANTS' UNOPPOSED MOTION FOR ENTRY OF JUDGMENT IN FAVOR OF DEFENDANTS, with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Attorney for Plaintiff

Gregory T. Mitchell
Law Office of Gregory T. Mitchell, PC
18141 Dixie Highway, Suite 100
Homewood , IL 60430
PH: 708-799-9325
Mitchalw00@comcast.net

/s/ Kristine S. Phillips _____
Kristine S. Phillips
O'HAGAN MEYER LLC
One E. Wacker Dr., Suite 3400
Chicago, Illinois 60601
Telephone: 312.422.6100
Facsimile: 312.422.6110
kphillips@ohaganmeyer.com

ATTORNEY FOR DEFENDANTS
CONSULTANTS IN PATHOLOGY, S.C. and
PATHOLOGY CONSULTANTS, INC.