

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

<b>Jamal Taylor, By His Next Of Friend LLonda Beasley</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>No 09 CV 4624</b>
	)	
<b>v.</b>	)	<b>Judge Sterling Johnson Jr.</b>
	)	
<b>Chicago Police Officers Nichols, Star # 17088, Sergeant Larson, Star #119 And the City of Chicago</b>	)	<b>Magistrate Judge Michael T. Mason</b>
	)	
	)	
<b>Defendants.</b>	)	

**MOTION TO ENTER JUDGMENT IN FAVOR  
OF THE CITY OF CHICAGO**

NOW COMES Defendant, the City of Chicago ("CITY"), by its attorney, EILEEN M. LETTS, ALLEN P. WALKER, LUCILLE A. BLACKBURN and CARL K. TURPIN of the law firm of GREENE AND LETTS, hereby moves this Court to enter a Judgment in favor of the City, in support of its Motion, the City states as follows:

1. On July 30, 2009, Plaintiff filed his complaint against the Defendant City of Chicago, James Nichols and Robert Larson.<sup>1</sup>
2. Plaintiff filed a respondeat superior claim against the City alleging the City was liable for the actions of its employee Officer James Nichols pursuant to 745 ILCS 10/9-102.
3. On July 27, 2010, after a two day jury trial, judgment was entered in favor of Officer James Nichols and against Plaintiff.

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<sup>1</sup> Robert Larson was dismissed from the suit on April 22, 2010.

4. As a matter of law, the City cannot be held liable because its employee, Officer James Nichols was found not liable.

5. The verdict form did not include The City of Chicago as a Defendant.

6. Judgment in favor of The City of Chicago should be entered as a matter of law.

Wherefore, The City of Chicago request that this Court, as a matter of law, enter judgment in favor of The City of Chicago.

Respectfully submitted,

CITY OF CHICAGO

By: /s/ Lucille A. Blackburn  
Lucille A. Blackburn

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