

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

JOSEPH J. SMITH,

PLAINTIFF,

V.

CAPTAIN MARK ALTMAN, *et. al.*,

DEFENDANTS.

Case No: 12-CV-04546

Judge: Ellis

Magistrate Judge: Kim

JOINT MOTION FOR JUDGMENT AND SATISFACTION

NOW COME the parties by their respective counsel, Blake Horwitz, on behalf of Plaintiff, and Thomas J. Platt, Deputy Corporation Counsel, on behalf of Defendants, and hereby request that the court enter judgment in this cause, stating as follows:

1. The parties agree to a judgment for compensatory damages and for additional attorney’s fees under 42 U.S.C.§1988 being entered in this cause against City of Chicago and Mark Altman and in favor of Joseph Smith as follows:

Wages	\$ 162,490.00
Pain, Suffering	\$ 600,000.00
Loss of Normal life	\$ 300,000.00
Attorneys’ Fees and Costs	\$ 60,000.00
Total Judgment	\$1,122,449.00

2. The City of Chicago agrees to indemnify and satisfy the judgment stated above for compensatory damages and attorney’s fees under 42 U.S.C. §1988 on behalf defendants City of Chicago and Mark Altman.

3. The parties further stipulate and agree that this is the final judgment in this case as to compensatory damages and all remaining attorney's fees and costs under 42 U.S.C. §1988.
4. The judgment for punitive damages against Mark Altman in the amount of \$5,000.00 was previously satisfied and paid in full by defendant Mark Altman.
5. The previous judgment for attorney's fees and costs under 42 U.S.C. §1988 against Defendants City of Chicago and Mark Altman in the total amount of \$479,334.03 has been satisfied and paid in full by defendant City of Chicago.

WHEREFORE, the Parties respectfully request that this Honorable Court grant this Joint Motion for Judgment.

Respectfully Submitted,

s/ Blake W. Horwitz
Attorney for Plaintiff

/s/ Jonathan Clark Green
Attorney for Defendant
City of Chicago

/s/ Kristin Pinkston
Attorney for Defendant
Mark Altman

s/ Thomas Platt
Deputy Corporation Counsel

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July 12, 2016

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CERTIFICATE OF SERVICE

I, the undersigned, an attorney, state that the foregoing Joint Motion for Judgment was served via the court's electronic filing system on July 12, 2016 to all parties of record.

s/ Blake W. Horwitz
Blake W. Horwitz, Esq.

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