

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

)	
LERROY HUBBARD III, ANITA HUBBARD and)	
LAKEESHA HUBBARD as next friend of K.H.,)	Case No. 15 CV 9051
)	
Plaintiffs,)	
)	
v.)	
)	
CITY OF CHICAGO, CHICAGO POLICE)	JUDGE GARY FEINERMAN
OFFICERS KEVIN RAKE (Star #7524), MATTHEW)	
MACKOWIAK (Star #5156), MYRIAN SWIATKOWSKI)	
(Star #4159), SERRANO JR., BLACKMAN and)	
UNKNOWN CHICAGO POLICE OFFICERS,)	
)	
Defendants.)	JURY DEMANDED

PLAINTIFF’S MOTION FOR ENTRY OF JUDGMENT

NOW COME the Plaintiffs, LEROY HUBBARD III, ANITA HUBBARD and LAKEESHA HUBBARD as next friend of K.H., by and through one of their attorneys, Abby D. Bakos of the Shiller Preyar Law Offices, and respectfully requests that this Court enter judgment against the Defendants in accordance with the terms of Defendants’ Rule 68 Offer of Judgment, and in support thereof, state as follows:

1. On July 19, 2016, Plaintiffs received Defendants’ Rule 68 Offer of Judgment.
2. On July 26, 2016, Plaintiffs filed their Notice of Acceptance of Defendants’ Rule 68 Offer of Judgment, Defendants’ Offer of Judgment and the Certificate of Service. (Dkt . 32).
3. Pursuant to the terms of the accepted Offer of Judgment, Plaintiffs now respectfully ask that this Court enter judgment in favor of Plaintiff Leroy Hubbard III and against all Defendants in the amount of \$15,001.00; in favor of Plaintiff Anita Hubbard and against all Defendants in the amount of \$5,001.00; and in favor of Plaintiff Lakeesha Hubbard as next friend of K.H. and against all Defendants in the amount of \$3,001.00 and reasonable

attorney's fees and costs accrued as of July 19, 2016, in an amount to be determined by the Court.

4. On July 28, 2016, as a courtesy, Plaintiff sent a copy of the proposed order to Defendants' counsel via email.
5. Plaintiff has attached a proposed judgment order as Exhibit A, and is submitting same to this Court's proposed order inbox via email.

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in favor of Plaintiff Leroy Hubbard III and against all Defendants in the amount of \$15,001.00, in favor of Plaintiff Anita Hubbard and against all Defendants in the amount of \$5,001.00 and in favor of Plaintiff Anita Hubbard and against all Defendants in the amount of \$3,001.00 plus reasonable attorney's fees and costs accrued as of July 19, 2016 in an amount to be determined by the Court.

Respectfully submitted,

s/ Abby D. Bakos
Abby D. Bakos
Attorney for Plaintiff
Shiller Preyar Law Offices
601 S. California Ave.
Chicago, IL 60612
(312) 226-4590

CERTIFICATE OF SERVICE

I, Abby D. Bakos, hereby certify that a copy of the foregoing was filed electronically using the Court's CM/ECF system to the attorneys of record on August 8, 2016.

Respectfully submitted,

s/ Abby D. Bakos
Abby D. Bakos
Attorney for Plaintiff
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