

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

<b>ALFONSO BROWN,</b>	)	
	)	<b>Case No. 15 C 2844</b>
<b>Plaintiff,</b>	)	
<b>v.</b>	)	<b>Judge Sara L. Ellis</b>
	)	
<b>GLENN EVANS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**AGREED MOTION FOR ORDER AND JUDGMENT ON PLAINTIFF’S FEE  
PETITION**

Plaintiff, Alfonso Brown, by and through his attorneys, Irene K. Dymkar, Shamoyita M. DasGupta, and Daniel H. Regenscheit, hereby moves this Court to enter an order and judgment on plaintiff’s petition for attorneys’ fees in the amount of \$55,000.00. In support of this motion, plaintiff states:

1. This action was commenced by the filing of a complaint alleging a cause of action under the Civil Rights Act of 1871 (42 U.S.C. §1983), to redress deprivations of the civil rights of plaintiff through acts and/or omissions of defendants committed under color of law.
2. On December 12, 2016, plaintiff accepted an offer of judgment on all claims from all defendants. Doc. 72. Judgment was entered in plaintiff’s favor on December 13, 2016, for \$20,001.00. Doc. 74. The issue of attorneys’ fees up to \$79,999.00, continued, to be resolved.
3. On February 17, 2017, plaintiff submitted his petition for attorneys’ fees in the amount of \$68,081.50. Doc. 78.

4. On March 1, 2017, the Court extended the March 3, 2017, deadline for defendants' objections to plaintiff's fee petition to March 7, 2017. Doc. 82.
5. On March 7, 2017, the parties agreed to the entry of judgment against defendants GLENN EVANS, RUBEN VARGAS, THERESA A. WALDBUESSER, CHRIS C. YOUNG, LUIS A. CENTENO, and CITY OF CHICAGO for all plaintiff's attorney's fees in the amount of \$55,000.00. The CITY OF CHICAGO agrees to indemnify GLENN EVANS, RUBEN VARGAS, THERESA A. WALDBUESSER, CHRIS C. YOUNG, and LUIS A. CENTENO and the CITY OF CHICAGO will be liable for payment of the entirety of the attorney's fees in the amount of \$55,000.00.
6. Plaintiff therefore requests an order and judgment for plaintiff's attorneys' fees in the amount of \$55,000.00.

WHEREFORE, plaintiff requests this Court enter an order and judgment for plaintiff's attorneys' fees in the amount of \$55,000.00.

Dated: March 7, 2017

/s/ Irene K. Dymkar  
Irene K. Dymkar

Plaintiff's Attorneys:

Irene K. Dymkar  
Shamoyita M. DasGupta  
Daniel H. Regenscheit  
Law Offices of Irene K. Dymkar  
53 West Jackson, Suite 733  
Chicago, IL 60604  
(312) 345-0123