

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

STATE OF ILLINOIS,

Plaintiff,

Case No.: 1:17-cv-06260

v.

Hon. Rebecca R. Pallmeyer

CITY OF CHICAGO,

Defendant.

**JOINT MOTION TO APPROVE THE PARTIES' STIPULATION REGARDING
INVESTIGATORY STOPS, PROTECTIVE PAT DOWNS AND
ENFORCEMENT OF LOITERING ORDINANCES**

Plaintiff, the State of Illinois, and Defendant, the City of Chicago (collectively, “the Parties”) request that the Court approve the Stipulation regarding Investigatory Stops, Protective Pat Downs and Enforcement of Loitering Ordinances and accompanying documents attached hereto as Exhibit 1:

1. The Parties have engaged in discussions and reached an agreement regarding the inclusion with the scope of the Consent Decree (Dkt. 703) of certain issues regarding investigatory stops, protective pat downs and the enforcement of the City of Chicago’s Gang and Narcotics loitering ordinances. Those agreements are memorialized in the attached Stipulation.

2. The Parties have consulted with the Independent Monitor regarding the Stipulation, and the Monitor does not object to this Stipulation.

WHEREFORE, the Parties jointly request that the Court enter an order approving the Stipulation regarding Investigatory Stops, Protective Pat Downs and Enforcement of Loitering Ordinances, set times and a process for those interested in providing oral or written comments

concerning the Stipulation to be afforded an opportunity to do so, and for such other relief that the Court deems just and proper.

Dated: June 16, 2023

Respectfully submitted,

Kwame Raoul
Attorney General for the
State of Illinois

Mary B. Richardson-Lowry,
Acting Corporation Counsel for the
City of Chicago

By: /s/ Karyn L. Bass Ehler

By: /s/ Allan T. Slagel

Karyn L. Bass Ehler
Assistant Chief Deputy Attorney General
Karyn.BassEhler@ilag.gov
Amy Meek, Bureau Chief
Civil Rights Bureau
Amy.Meek@ilag.gov
Mary J. Grieb, Deputy Bureau Chief,
Civil Rights Bureau
Mary.Grieb@ilag.gov
Rebekah Newman,
Assistant Attorney General,
Special Litigation Bureau
Rebekah.Newman@ilag.gov
Office of the Illinois Attorney General
100 West Randolph Street
11th Floor
Chicago, Illinois 60601
(312) 814-5968

Christopher G. Wells
Chief, Public Interest Division
christopher.wells@ilag.gov
Office of the Illinois Attorney General
100 West Randolph Street
Chicago, IL 60601
(312) 814-3000

Allan T. Slagel
aslagel@taftlaw.com
Elizabeth E. Babbitt
ebabbitt@taftlaw.com
Paul J. Coogan
pcoogan@taftlaw.com
Anna Greve
agreve@taftlaw.com
TAFT STETTINIUS & HOLLISTER LLP
111 East Wacker Drive
Suite 2600
Chicago, Illinois 60601
(312) 527-4000

Jennifer Bagby
Jennifer.Bagby@cityofchicago.com
Deputy Corporation Counsel
City of Chicago Department of Law
Public Safety Reform Division
121 North LaSalle Street
Room 600
Chicago, Illinois 60602
(312) 742-6408