

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

DANIEL TAYLOR,

Plaintiff,

vs.

No.: 14 cv 737

**CITY OF CHICAGO, ANTHONY
VILLARDITA #20849., THOMAS JOHNSON
#20820. BRIAN KILLACKY#20748, TERRY
O’CONNOR #20831, RICK ABREU #20796,
ROBERT DELANEY #20383, SEAN GLINSKI
#3122, MICHAEL BERTI #12881, AND
UNIDENTIFIED EMPLOYEES OF THE
CITY OF CHICAGO,**

Defendants.

MOTION FOR SUMMARY JUDGMENT

NOW COME defendants, ANTHONY VILLARDITA, THOMAS JOHNSON, BRIAN KILLACKY, TERRY O’CONNER, RICK ABREU, ROBERT DELANEY, SEAN GLINSKI and MICHAEL BERTI (collectively "defendant officers"), by and through their attorneys, Steven B. Borkan, Timothy P. Scahill and Misha Itchhaporia of BORKAN & SCAHILL, LTD., and pursuant to Fed. R. Civ. P. 56 move for summary judgment on all of Plaintiff’s Complaint as well as Plaintiff’s claims in Count II of his Complaint

1. For the reasons set forth in Defendant Officers’ contemporaneously-filed Memorandum of Law in Support of Summary Judgment, Local Rule 56.1 Statement of Material Facts, and Addendum of Exhibits, Defendant Officers pray summary judgment be entered in their favor on Plaintiff’s Complaint.

WHEREFORE Defendant Officers pray this Court enter summary judgment in their favor on Plaintiff's Complaint and against Plaintiff and grant any other relief the Court deems proper.

Respectfully submitted,

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