

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

DANIEL TAYLOR,)	
)	
Plaintiff,)	
)	Case No. 14 C 0737
v.)	
)	Judge John Z. Lee
CITY OF CHICAGO, et al.,)	
)	Magistrate Judge Sheila M. Finnegan
Defendants.)	

**DEFENDANT CITY OF CHICAGO'S
LOCAL RULE 56.1(A)(3) STATEMENT OF FACTS**

Defendant, the City of Chicago (“City”), by its attorneys, submits this statement of facts pursuant to Local Rule 56.1(a)(3) of the United States District Court for the Northern District of Illinois, Eastern Division:

I. PARTIES, VENUE, JURISDICTION

1. The City is a municipal corporation and local government as defined by Illinois law. **(Plaintiff’s Complaint, Dkt. 1 at ¶9).**

2. Plaintiff, Daniel Taylor is a resident of Evanston, Cook County, Illinois. **(Dkt. 1 at ¶7).**

3. Venue and jurisdiction are proper in the Northern District of Illinois because the City is located within this judicial district and the events giving rise to this action occurred within this judicial district. **(Plaintiff’s Compl. at ¶5-6); see also 28 U.S.C. §§ 1331 and 1343.**

II. UNIDENTIFIED OFFICERS

4. Plaintiff included unidentified employees of the City of Chicago in the caption of the complaint and in the opening paragraph. **(Dkt. 1).**

5. Since the filing of the complaint, plaintiff has not identified or otherwise disclosed the “Unidentified Employees” referenced in the complaint.

Respectfully submitted,

THE CITY OF CHICAGO

By: s/ Daniel M. Noland

One of its Attorneys

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Reiter Burns LL
311 South Wacker Drive, Suite 5200
Chicago, IL 60606
(312) 982-0090 (telephone)
(312) 429-0644 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that on **September 14, 2018**, I electronically filed the foregoing **Defendant City of Chicago's Local Rule 56.1(a)(3) Statement of Facts** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to:

Locke E. Bowman
David M. Shapiro
Alexa Van Brunt
J. Samuel Tenenbaum
Roderick and Solange
MacArthur Justice Center
375 E. Chicago Ave.
Chicago, IL 60611
(312) 503-0844
l-bowman@law.northwestern.edu
david.shapiro@law.northwestern.edu
a-vanbrunt@law.northwestern.edu
s-tenenbaum@law.northwestern.edu

Steven B. Borkan
Timothy P. Scahill
Graham P. Miller
Misha Itchhaporia
Whitney N. Hutchinson
Krista Stalf
Borkan & Scahill, Ltd.
20 South Clark Street
Suite 1700
Chicago, IL 60603
(312) 580-1030
sborkan@borkanscahill.com
tscahill@borkanscahill.com
gmiller@borkanscahill.com
mitchhaporia@borkanscahill.com
whutchinson@borkanscahill.com
kstalf@borkanscahill.com

Jon Loevy
Gayle Horn
David B. Owens
Loevy & Loevy
311 N. Aberdeen St., 3rd Floor
Chicago, IL 60607
jon@loevy.com
gayle@loevy.com
david@loevy.com

s/ Daniel M. Noland
