

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

ERIC WILKINS, *et al.*,

Plaintiffs,

v.

CITY OF CHICAGO,

Defendant.

Case No. 1:23-cv-04072

Hon. Mary M. Rowland

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs Eric Wilkins, Mahari Bell, Essence Jefferson, José Manuel Almanza, Jr., and Jacquez Beasley, on behalf of themselves and the proposed class they seek to represent, hereby move to certify this matter as a class action pursuant to Federal Rule of Civil Procedure 23(b)(2).

Plaintiffs also respectfully request that this Court appoint the undersigned as class counsel and Plaintiffs as class representatives.

Plaintiffs seek an order certifying this matter as a class action pursuant to Federal Rule of Civil Procedure 23(b)(2) because each of the requirements are met for class treatment under Federal Rule of Civil Procedure 23(a) and (b)(2), and the proposed class counsel meet all of the requirements set forth in Federal Rule of Civil Procedure 23(a) and (g). The grounds for this motion are explained in the accompanying Memorandum of Law and its exhibits.

WHEREFORE, for the reasons set forth above and in the accompanying Memorandum of Law, the court should certify the proposed class.

Date: August 11, 2025

Respectfully submitted,

/s/ Daniel E. Raymond

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