



**CERTIFICATE OF SERVICE**

I, Louis A. Klapp, an attorney, hereby certify that I caused a true and correct copy of the foregoing **Notice of Filing**, and **Plaintiff's Motion to Strike and Dismiss Defendants' Third Affirmative Defense** referenced therein, to be served upon the following:

AMBER ACHILLES RITTER, Chief Assistant Corporation Counsel  
TIA MATHEW, Assistant Corporation Counsel  
Legal Information, Investigations, and Prosecutions Division  
30 North LaSalle Street, Suite 1720  
Chicago, Illinois 60602  
tia.mathew@cityofchicago.org  
amber.ritter@cityofchicago.org

via e-mail to the addresses indicated and via U.S. Mail, proper first-class postage prepaid, sent on this 17th day of August, 2018, on or before 5:00 p.m.

  
\_\_\_\_\_  
Louis A. Klapp

FILED DATE: 8/17/2018 3:56 PM 2018ch07758

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, CHANCERY DIVISION

AMERICAN CIVIL LIBERTIES  
UNION OF ILLINOIS,

Plaintiff,

v.

CHICAGO POLICE DEPARTMENT,  
CITY OF CHICAGO

Defendants.

No. 18 CH 07758

Hon. Anna Demacopoulos

**PLAINTIFF'S MOTION TO STRIKE AND DISMISS  
DEFENDANTS' THIRD AFFIRMATIVE DEFENSE**

---

Plaintiff American Civil Liberties of Illinois respectfully moves the Court to strike and dismiss the Third Affirmative Defense of Defendants Chicago Police Department and City of Chicago. The basis for this motion is contained within Plaintiff's Memorandum in Support of Its Motion to Strike and Dismiss Defendants' Third Affirmative Defense, which is filed concurrently with this motion.

DATED: August 17, 2018

Respectfully submitted,



---

Attorneys for Plaintiff

Karen Sheley  
Rachel Murphy  
ROGER BALDWIN FOUNDATION OF ACLU, INC.  
150 N. Michigan Ave., Suite 600  
Chicago, IL 60601  
Tel: 312-201-9740  
Fax: 312-201-9760  
ksheley@aclu-il.org  
rmurphy@aclu-il.org

Steven V. Hunter  
Louis A. Klapp  
QUARLES & BRADY LLP  
300 North LaSalle Street, Suite 4000  
Chicago, IL 60654  
Tel: 312-715-5000  
Fax: 312-632-1948  
steven.hunter@quarles.com  
louis.klapp@quarles.com