

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

ETHEL WILLIAMS, et al.,)	
)	
Plaintiffs,)	No. 05 C 4673
)	
vs.)	Judge Hart
)	Magistrate Judge Denlow
PAT QUINN, et. al.,)	
)	
Defendants.)	

AGREED MOTION TO ENTER JUDGMENT ORDER

Pursuant to the approved Consent Decree in this case, Plaintiffs and Defendants respectfully move that this Court enter a Judgment Order reflecting reasonable costs and expenses incurred by Class Counsel.

1. The Consent Decree (Decree) was approved on September 29, 2010. (Dkt. No. 326.) The Decree states that in full settlement of all out-of-pocket costs and expenses (not including attorneys' fees) incurred by Class Counsel through approval of the Decree, Defendants shall pay Class Counsel such costs and expenses and that the amount shall be set forth in a Judgment Order to be entered by the Court. (Decree ¶22.)

2. An Amended Judgment was entered by the Court on November 1, 2010 (Dkt. No. 335) in favor of Class Counsel and against Defendants in the amount of \$1,990,000 representing attorneys' fees only. The accompanying Order directed the parties to follow the procedure set forth in Paragraph 22 of the Decree concerning costs and expenses. (Dkt. No. 334 ¶4.)

3. The parties have agreed to the amount of \$401,828.58 representing Class Counsels' reasonable out-of-pocket costs and expenses.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court enter the attached Judgment Order in the amount of \$401,828.56, reflecting the agreed amount of costs and expenses incurred by Class Counsel.

Dated: February 15, 2011

Respectfully submitted,

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