

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

ETHEL WILLIAMS, et al.,	)	
	)	
Plaintiffs,	)	No. 05-cv-4673
v.	)	
	)	Judge Joan H. Lefkow
BRUCE RAUNER, et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION TO ENTER AGREED JUDGMENT ORDER**

Pursuant to the approved Consent Decree in this case, Plaintiffs and Defendants respectfully move that this Court enter an Agreed Judgment Order for payment in the amount of \$126,562.20 in full settlement of all reasonable attorneys' fees, costs and expenses incurred by Class Counsel from October 1, 2017 through and including June 30, 2018, and payment in the amount of \$112,952.45 in full settlement of all reasonable attorneys' fees, costs and expenses incurred by Class Counsel from July 1, 2018 through and including December 31, 2018.

1. The Consent Decree (Decree) was approved on September 29, 2010. (Dkt. No. 326.)
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. A further Amended Judgment was entered by the Court on February 16, 2011 (Dkt. No. 342) in favor of Class Counsel and against Defendants in the amount of \$401,828.58 representing Class Counsels' reasonable out-of-pocket costs and expenses.
3. The Parties have agreed that Defendants will pay to Class Counsel reasonable attorneys' fees, costs and expenses in the amount of \$126,562.20 incurred from October 1, 2017

through and including June 30, 2018 and \$112,952.45 incurred from July 1, 2018 through and including December 31, 2018.

4. The Defendants will cause vouchers for payment in the amounts of \$126,562.20 and \$112,952.45 to be submitted for processing under the standard vouchering procedures and they will be processed in accordance with the Comptroller's requirements.

WHEREFORE, Plaintiffs and Defendants respectfully request that the Court enter the proposed Agreed Judgment Order in the amounts of \$126,562.20 and \$112,952.45, reflecting the agreed amounts of reasonable attorneys' fees, costs and expenses incurred by Class Counsel from October 1, 2017 through and including December 31, 2018.

DATED: March 29, 2019

**COUNSEL FOR DEFENDANTS**

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/s/ Brent D. Stratton  
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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, certifies that on March 29, 2019, he caused a copy of the above and foregoing JOINT MOTION TO ENTER AGREED JUDGMENT ORDER to be served on all counsel of record via the Court's electronic filing system (CM/ECF).

/s/ Brent D. Stratton