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FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

DEC 26 2001

MICHAEL W. DOBBINS
CLERK; U. S. DISTRICT COURT

Kenya Gary and Tania Hayes,
individually and on behalf of
a class,)

Plaintiffs,)

vs.)

MICHAEL SHEAHAN,
SHERIFF OF COOK COUNTY,
in his official capacity,)

Defendant.)

No.96 C 7294

JUDGE David Coar
MAGISTRATE Guzman

DOCKETED

DEC 27 2001

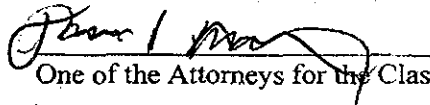
NOTICE OF EMERGENCY MOTION

To: See Service List

PLEASE TAKE NOTICE that on December 26,2001 at 9:15 a.m. or as soon thereafter as this motion may be heard, I shall appear before the Honorable David Coar of the United States District Court for the Northern District of Illinois, Eastern Division, in Room 1419, 219 South Dearborn Street, Chicago, Illinois, or, in the absence of said Judge, before any other Judge or Magistrate who may be sitting in place or stead of said Judge and then and there present an Emergency Motion To Enforce Settlement at which time and place you may appear if you so desire.

Dated this 24th day of December , 2001 at Chicago, Illinois.

Respectfully submitted,


One of the Attorneys for the Class

Thomas G. Morrissey Ltd.
Robert H. Farley, Jr. ltd.
10249 S. Western Ave.
Chicago, Il 60643
(773) 233-7900

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
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EMERGENCY MOTION TO ENFORCE SETTLEMENT

Now comes the Plaintiff Class, by and through their attorneys, Thomas G. Morrissey and Robert H. Farley, Jr., and request this Honorable Court to order the County Comptroller or his agent to immediately issue the checks to the class members and to provide an accounting to this court on the status of the checks to be distributed. In support of this motion, the plaintiff class states as follows:

1. On December 18,2001, one of the attorneys for the Sheriff appeared before this Court and represented that the checks would be promptly placed in the mail. Based upon this representation, the women were informed by the attorney for the class that the checks would be mailed on December 19,2001.

2. The Final Judgment Order approving the settlement of this case pursuant to the Settlement Agreement was entered on September 18,2001. There were no appeals filed to this

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Order.

3. The attorneys for the parties have appeared weekly before this Court on the plaintiffs Motion To Enforce the Settlement. Each time the defendant's attorney represents that the checks will be promptly placed in the mail.

4. Under the Settlement Agreement, 3,0051 women are entitled to receive compensation. Each day, the plaintiff's lawyer and his paralegal receive over 200 calls during the day from class members and in excess of 200 voice mail messages, demanding to know when they will receive their checks. On information and belief, a few class members have received their settlement checks, but the majority of the class members have not received their settlement checks.

Wherefore the plaintiffs pray for an order requiring the County Comptroller or his agent to immediately to issue the checks to the class members and to provide an accounting to this Court in regards to the status of the checks to be distributed.

Respectfully submitted,

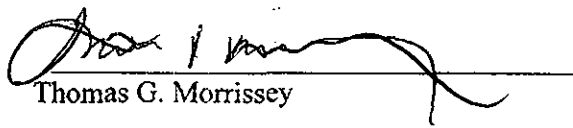

One of the Attorneys for the Class

Thomas G. Morrissey Ltd.
Robert H. Farley, Jr. Ltd.
10249 S. Western Ave.
Chicago, Il 60643
(773) 233-7900

CERTIFICATE OF SERVICE

I, Thomas G. Morrissey, an attorney, deposes and states that he served a copy of the foregoing Emergency Motion To Enforce Settlement upon parties listed below by mailing and faxing a copy on or before 5:00 p.m. on December 24, 2001.

Patrick T. Driscoll, Jr.
Thomas Burnham
Michael Jacobs
Assistant State's Attorneys
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-3000 (F)


Thomas G. Morrissey