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

WILLIAM H. RICHARD,

Plaintiff,

v.

JOHN R. BALDWIN, Director of the Illinois Department of Corrections, RANDY PFISTER, Warden, RICARDO TEJEDA, Assistant Warden,

Defendants.

No. 17 C 4677

Hon. Judge Thomas M. Durkin

Hon. Mag. Judge Jeffrey Cole

SATISFACTION AND RELEASE OF JUDGMENT

A judgment in the amount of \$750,000.00 was entered in the above-captioned lawsuit (the "Action") on August 24, 2021, in favor of William Richard ("Plaintiff"), and against Rob Jeffreys, in his official capacity as Director of the Illinois Department of Corrections, Randy Pfister, and Ricardo Tejeda ("Defendants"), collectively referred to as the "Parties." In addition, punitive damages in the amount of \$75,000.00 were entered against Defendant Ricardo Tejeda. A Petition for fees and costs was filed on November 23, 2021, and remains pending with the Court.

The Parties have entered into a settlement agreement that satisfies the judgment in regards to any damages awarded by the jury in this Action and resolves any remaining issues pending before the Court including Plaintiff's request for attorneys' fees, costs, or expenses allegedly incurred by Plaintiff's attorneys for litigation of the Action. Other than the settlement amount agreed to in the settlement agreement, Plaintiff waives the right to pursue any other payment related to the Action.

THEREFORE, full and complete satisfaction of this judgment is acknowledged, and the Clerk of the Court is authorized and directed to make an entry of the full and complete satisfaction on the docket of the judgment.

Dated: July 6, 2022

RESPECTFULLY SUBMITTED,

/s/ Samantha Reed
One of the Attorneys for Plaintiff

Samantha Reed
Dentons LLP
233 S. Wacker Drive, Suite 5900
Chicago, IL 60606
samantha@equipforequality.org

Amanda Antholt EQUIP FOR EQUALITY 20 North Michigan Avenue, Suite 300 Chicago, Illinois 60602 (312) 895-7330 amanda@equipforequality.org

CERTIFICATE OF SERVICE

I, the undersigned attorney, hereby certify that on July 6, 2022, the foregoing document was filed electronically via the CM/ECF system, which will provide notice to all parties of record.

/s/ Samantha Reed
Samantha Reed