



April 24, 2024

VIA EMAIL

Mayor Henyard and Board of Trustees  
Village of Dolton  
14122 Martin Luther King Drive  
Dolton, Illinois 60419

*Re: Withdrawal From Cases*

Dear Mayor Henyard and Board:

The Board recently voted to stop paying our legal bills. We are, of course, not required to work for free and decline to do so. Additionally, the law firm of Odelson, Murphey, Frazier and McGrath has tortiously interfered with our business relationship and falsely accused us of having conflicts.

As we are not being paid, we will not be entering any appearances or otherwise defending the following newly filed cases:

- (1) *Wiederman v. Village of Dolton, et al.*, Case No. 24 CV 000543
- (2) *Collins v. Village of Dolton*, Case No. 24 CH 000571
- (3) Any other newly filed case

We will also be withdrawing from the following cases:

- (1) *Rubbie Anderson v. Village of Dolton*, Case No. 23 L 5854 (Cook County)
- (2) *Burns v. Village of Dolton*, Case No. 23 CV 0766 (Northern District of Illinois)
- (3) *Dolton Park District v. Village of Dolton*, Case No. 23 CH 7493 (Cook County)
- (4) *300 W. Sibley Blvd v. Village of Dolton*, Case No. 23 CH 05369 (Cook County)
- (5) *Dolton Sibley Woodlawn v. Village of Dolton*, Case No. 23 L 011670 (Cook County)
- (6) *Edgar County Watchdogs v. Village of Dolton*, Case No. 24 CH 01012 (Cook County)
- (7) *George's Towing, Inc. v. Village of Dolton*, Case No. 23 CV 6441 (Northern District of Illinois)
- (8) *Destinie Hall v. Village of Dolton*, Case No. 24 L 001475 (Cook County)
- (9) *IAFF v. Village of Dolton*, Case No. 23 CH 06660 (Cook County)





- (10) *Kraft v. Village of Dolton*, Case No. 22 CH 11352 (Cook County)
- (11) *Crystal Looney v. Village of Dolton*, Case No. 24 M6 002295
- (12) *Lane as Executor of Estate of Ross*, Case No. 23 CV 14097 (Cook County)
- (13) *Aris Montgomery v. Village of Dolton*, Case No. 23 CV 03085 (Northern District of Illinois)
- (14) *Pablo's Café and Bar v. Village of Dolton*, Case No. 24 CV 01770 (Northern District of Illinois)
- (15) *Redeemed Christian Church of God v. Village of Dolton*, Case No. 24 CV 01868 (Northern District of Illinois)
- (16) *Lavelle Redmond v. Village of Dolton* – Both Northern District of Illinois and Illinois Department of Human Rights
- (17) *Marcus Redwood v. Village of Dolton*, Case No. 24 M1 300270 (Cook County)
- (18) *Lakendra Williams v. Village of Dolton*, Case No. 23 L 010831 (Cook County)
- (19) *Cara Wilson v. Village of Dolton, et al.*, Case No. 22 CV 03609 (Northern District of Illinois)

Please note that (1), (8), (12), (18), (19) are all personal injury and/or constitutional cases that involve serious injury or death. For example, (12) and (18) are both jail suicide by hanging cases. (8) and (19) are officer involved shooting wrongful death causes of action.

In recent cases, there has been a struggle to find qualified municipal defense firms by the TPA and insurer. No one wants to represent the Village. The Village already has a \$33.5 million judgment against it that the previous administration and the Board ignored pleas to settle within policy limits, where the Village's best hope is that the jury verdict be reversed on appeal. If that is unsuccessful, the Village will owe more than \$20M in excess insurance policy limits on that case alone. The Village is quickly approaching the point of being uninsurable. Failure to defend in these lawsuits will likely result in the Village being found in default on these cases and losing insurance coverage on those cases as well as many others based on a failure to defend. We would be remiss not to mention that legislative counsel purporting to be the proper attorney to defend any Village cases far exceeds their authority and is a direct conflict of interest not waivable under the Rules of Professional Conduct.

We urge the corporate authorities to work together to ensure that qualified municipal defense firms represent the Village in its pending litigation matters.



By **May 8, 2024** we will file motions to withdraw in all said cases.

Sincerely,  
DEL GALDO LAW GROUP, LLC

Michael T. Del Galdo

cc: Jennifer Obecunas, CCMSI (via e-mail)