

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF ILLINOIS

CHAD HAMMOND,

Plaintiff,

vs.

Case No. 23-cv-3058

BRIAN MCREYNOLDS, et al.

Defendants.

**Joint Stipulation to Amend Complaint to Dismiss Individual  
Defendants and Add a New Defendant**

Now come the Plaintiff, Chad Hammond, and Defendants, DR. MONICA DURAN and CATHY STEPHENS, RN, by their attorneys, QUINN JOHNSTON, and for their Joint Stipulation to Amend Complaint to Dismiss Individual Defendants and Add a New Defendant, state as follows:

1. The Parties have reached an agreement regarding amendments to the pleadings going forward in this matter and ask that the Court amend the Defendants in this case by interlineation.
2. The current Defendants, Dr. Monica Duran and Cathy Stephens, RN, are to be dismissed in this matter and terminated as parties to the case.
3. Their employer, USA Medical and Psychological Staffing, is to be named as Defendant in their place.
4. Pursuant to Fed. R. Civ. P. 15(a)(2), Plaintiff may amend the Complaint "with the opposing party's written consent."

5. Undersigned Counsel will appear and waive service for USA Medical and Psychological Staffing as soon as the Court allows the Amendment. No additional discovery or alteration to the existing schedule will be necessary.

WHEREFORE, Plaintiff, CHAD HAMMOND, and Defendants, DR. MONICA DURAN and CATHY STEPHENS, RN, and pray this court dismiss current Defendants, Dr. Monica Duran and Cathy Stephens, RN and terminate them as defendants, and amend the complaint by interlineation to add USA Medical and Psychological Staffing as a Defendant in their place, and grant any further relief which this Court deems just and proper.

By:  s/ Chad Hammond  
2/6/25  
CHAD HAMMOND, Plaintiff

DR. MONICA DURAN and CATHY  
STEPHENS, RN, Defendants

By: s/ Peter R. Jennetten  
QUINN JOHNSTON

Peter R. Jennetten (Illinois Bar No. 6237377)  
Email for pleadings: [jennettenpleadings@quinnjohnston.com](mailto:jennettenpleadings@quinnjohnston.com)  
Email for correspondence: [pjennetten@quinnjohnston.com](mailto:pjennetten@quinnjohnston.com)  
QUINN JOHNSTON  
227 N.E. Jefferson Ave.  
Peoria, IL 61602-1211  
(309) 674-1133 (phone)  
(309) 674-6503 (fax)