

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

DONLYN DISTRIBUTION INC. )  
d/b/a DONLYN 2 INC. formerly Donlyn Inc., )  
an Illinois Corporation )

BARBARA MITCHELL, individually and )  
on behalf of DONLYN DISTRIBUTION INC. )  
d/b/a DONLYN 2 INC. formerly Donlyn Inc., )  
an Illinois Corporation )

Plaintiffs, )

v. )

BP AMOCO CORPORATION )  
also known as BP Amoco Oil Company, )  
and formerly Amoco Oil Company, )  
a Maryland Corporation )

CHICAGO TRANSIT AUTHORITY )  
an Illinois Municipal Corporation )

Defendants, )

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

CASE NO. 01C 5728  
JUDGE GUZMAN

NOTICE OF FILING

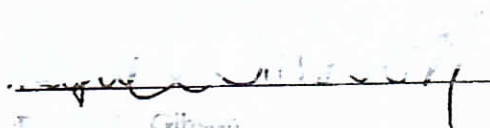
To: Emily Nicklin  
Sarah Marmor  
KIRKLAND & ELLIS  
200 E. Randolph Drive  
Chicago, IL 60601

Kathleen H. Herrmann  
Eric Mennell  
David R. Buetow  
Chicago Transit Authority  
Law Department  
Merchandise Mart Plaza, Room 772  
Chicago, IL 60654

PLEASE TAKE NOTICE that Tuesday, November 27, 2001 or soon thereafter  
Plaintiffs shall file a copy of Plaintiffs' First Amended Complaint At Law, a copy of  
which is attached hereto and served upon you.

- a) That a finding be entered that Defendant neglected to prevent illegal and wrongful conduct in furtherance of a conspiracy prohibited under 42 U.S.C. § 1985(3) to discriminate against Plaintiffs the basis of race and deprive Plaintiffs of federally protected rights, pursuant to 42 U.S.C. § 1986;
- b) That a finding be entered that Defendant is liable for damages caused by the Defendant's neglect to prevent illegal and wrongful acts prohibited under 42 U.S.C. § 1985(3) conspired to be done and committed, pursuant to 42 U.S.C. § 1986;
- c) That Plaintiffs be awarded compensatory damages for Defendant's neglect to prevent illegal and wrongful conduct in furtherance of a conspiracy prohibited under 42 U.S.C. § 1985(3) to discriminate against Plaintiffs on the basis of race and deprive of Plaintiffs of federally protected rights under CTA's financial assistance agreements and both CTA Contracts 1997 and CTA Contract 1999 (with two (2) one (1) year extension options);
- d) That Plaintiffs be awarded compensatory damages for Plaintiffs' loss of prospective business opportunities under other financially assisted contracts containing DBE participation requirements due to Defendant's neglect to prevent illegal and wrongful conduct in violation of 42 U.S.C. § 1985(3), pursuant to 42 U.S.C. § 1986;
- e) That Plaintiffs be awarded compensatory damages for pain and suffering and intentional infliction of emotional distress due to Defendant's neglect to prevent illegal and wrongful conduct in violation of 42 U.S.C. § 1985(3), pursuant to 42 U.S.C. § 1986;
- f) That Plaintiffs be awarded attorneys fees and costs; and,
- g) That Plaintiffs be awarded such further relief as this Court deems just and proper.

Respectfully Submitted,

  
T. J. C. Williams  
Attorney for Plaintiffs

November 27, 2001

Respectfully Submitted,

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Attorney for Plaintiffs  
1862 Terry Drive  
Joliet, IL 60436  
Phone: (815) 773-0860  
Fax: (815) 773-0875

Counsel for Plaintiffs  
Donlyn Distribution Inc. &  
Barbara Mitchell

CERTIFICATE OF SERVICE

I, [redacted], an attorney, hereby certifies that she caused the attached Plaintiffs' First Amended Complaint At Law, to be served upon Defendants' counsel, Sarah Marmor of Kirkland & Ellis, 200 E. Randolph Drive, Chicago, IL 60601 and David Buetow of the Chicago Transit Authority, Law Department, Merchandise Mart, Room 772, Chicago, IL 60654 U.S. mail, postage pre-paid on November 27, 2001.