

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

LEINANI DESLANDES, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

McDONALD'S USA, LLC, *et al.*

Defendants.

Civil Case No. 17-cv-04857

Judge Jorge L. Alonso
Magistrate Judge M. David Weisman

STEPHANIE TURNER, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

McDONALD'S USA, LLC, *et al.*

Defendants.

Civil No. 19-cv-05524

**PLAINTIFFS' CROSS-MOTION FOR SUMMARY JUDGMENT ON MCDONALD'S
ASSERTED JUSTIFICATIONS**

Pursuant to Fed. R. Civ. P. 56 and L.R. 56.1(a), Plaintiffs Leinani Deslandes and Stephanie Turner, by their undersigned counsel, submit this Cross-Motion for Summary Judgment on McDonald's Asserted Justifications. In support of this motion, Plaintiffs have filed contemporaneously a Combined Memorandum of Law in Opposition to McDonald's Motion for Summary Judgment and in Support of Cross-Motion for Summary Judgment on McDonald's Asserted Justifications, a Statement of Material Facts Pursuant to Local Civil Rule 56.1 and Exhibits Thereto, and a Response to McDonald's Statement of Undisputed Material Facts and Exhibits Thereto.

WHEREFORE, Plaintiffs respectfully request that the Court enter judgment in favor of Plaintiffs on McDonald's asserted justifications.

Dated: November 16, 2021

Respectfully submitted,

/s/ Dean M. Harvey

Dean M. Harvey*

Anne B. Shaver*

Lin Y. Chan*

Yaman Salahi*

**LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP**

275 Battery Street, 29th Floor

San Francisco, California 94111-3339

Tel: (415) 956-1000

dharvey@lchb.com

ashaver@lchb.com

lchan@lchb.com

ysalahi@lchb.com

Jessica A. Moldovan*

**LIEFF CABRASER HEIMANN & BERNSTEIN,
LLP**

250 Hudson Street, 8th Floor

New York, NY 10013

Tel: (212) 355-9500

jmoldovan@lchb.com

Derek Y. Brandt (#6228895)

Leigh M. Perica (#6316856)

Connor P. Lemire*

MCCUNE WRIGHT AREVALO, LLP

231 North Main Street, Suite 20

Edwardsville, Illinois 62025

Tel: (618) 307-6116

Fax: (618) 307-6161

dyb@mccunewright.com

lmp@mccunewright.com

cpl@mccunewright.com

Richard D. McCune*

Michele M. Vercoski*

MCCUNE WRIGHT AREVALO, LLP

3281 East Guasti Road, Suite 100

Ontario, California 91761
Tel: (909) 557-1250
rdm@mccunewright.com
mmv@mccunewright.com

*Counsel for Individual and Representative Plaintiffs
Leinani Deslandes and Stephanie Turner*

* Admitted *pro hac vice*

CERTIFICATE OF SERVICE

I, Dean M. Harvey, an attorney, hereby certify that the foregoing document was electronically filed on November 16, 2021 and will be served electronically via the Court's ECF Notice system upon the registered parties of record.

/s/ Dean M. Harvey _____
Dean M. Harvey