

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Keith Rogers,

Plaintiff,

-vs-

Thomas Dart, Sheriff of Cook County,
et al.,

Defendants.

No. 15-cv-11632

Hon. Edmund E. Chang

**AGREED MOTION TO REMOVE CERTAIN EXHIBITS TO DEFENDANT COOK
COUNTY'S MOTION TO DECERTIFY FROM THE DOCKET
AND FOR LEAVE TO FILE THEM UNDER SEAL**

Defendant COOK COUNTY, by and through its attorney, Kimberly Foxx, State's Attorney of Cook County, by Assistant State's Attorney Lyle Henretty, for this Agreed motion to remove certain exhibits attached to its Motion to Decertify (Docket No. 217) from the Court's docket, and for leave to refile them under seal.

1. On January 9, 2022, Defendant Cook County filed its Motion to Decertify or, in the alternative, Amend the Class Definition.
2. Attached to the Motion as Exhibit D was the May 10, 2018 Deposition of Stamatia Richardson, the director of the Opioid Treatment Program ("OTP") at the Cook County Jail.
3. Attached to the Motion as Group Exhibit G were portions of the SAMMS dosing records, indicating the doses of methadone provided to specific class members/patient while they were in the OTP.

4. The undersigned has conferred with attorneys for the Plaintiff and Co-Defendant Dart.

The parties agree that both Exhibit D and Group Exhibit G contain medical information for class members. The parties also agree that these documents should be filed under seal.

5. As such, Cook County requests that this Court instruct the clerk's office to remove Exhibit D and Group Exhibit G from the docket, and that Cook County be granted leave to re-file them under seal.

WHEREFORE, Defendant Cook County prays this Court enters an order instructing the clerk's office to remove Exhibit D and Group Exhibit G from the docket, granting Cook County leave to re-file these exhibits under seal, and for any other relief that this Court deems just and proper.

Dated: January 10 2023

Respectfully Submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ Lyle Henretty
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For Defendant Cook County

CERTIFICATE OF SERVICE

I, Lyle K. Henretty, Assistant State's Attorney, hereby certify that I served a copy of the attached document on the parties of record via the ECF electronic filing system on January 10, 2023.

/s/ Lyle K. Henretty