

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

Keith Rogers, et al.,)
)
 Plaintiffs,)
) No. 15-cv-11632
 -vs-)
)
 Sheriff of Cook County and Cook) (Judge Chang)
 County, Illinois,)
)
 Defendants)

MOTION TO FILE UNDER SEAL

Plaintiffs, by counsel and pursuant to Local Rule 26.2, respectfully seek leave to file under seal Exhibits 13, 17, and 22. Plaintiffs also request an order allowing the slightly tardy filing of plaintiffs' summary judgment documents.

Grounds for this motion are as follows:

1. Plaintiff seeks leave to file three documents under seal:
 - a. Exhibit 13, the deposition of Dr. Richardson, which is subject to a previously issued protective order, and
 - b. Exhibit 17 and 22, which include methadone treatment records that are confidential pursuant to 42 C.F.R. § 2.12(a).
2. Pursuant to Local Rule 26.2, plaintiffs have provisionally filed materials under seal.

3. Plaintiffs' summary judgment documents were due on July 24, 2025; counsel filed the first document shortly before midnight and the last document shortly after midnight. Plaintiffs respectfully request that the Court forgive this brief tardiness.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
ARDC No. 08830399
Joel A. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
Attorneys for Plaintiff