

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

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

**UNOPPOSED MOTION TO FILE UNDER SEAL
AND TO SUBSTITUTE PLEADINGS**

Plaintiffs, by counsel and pursuant to Local Rule 26.2, respectfully seek leave to file under seal Exhibits 26 and 29, in addition to Exhibits 13, 17, and 22, the subject of a previous motion. (ECF No. 293.) Plaintiffs also request an order allowing corrections to plaintiffs' summary judgment filings. Plaintiffs propose an adjustment to the briefing schedule in light of the corrections. Defendants do not oppose this motion.

Grounds for this motion are as follows:

1. Undersigned counsel made several errors in the late-night filing on July 24, 2025: Counsel filed drafts, rather than the last revisions of the summary judgment pleadings. Counsel also filed as public documents exhibits 26, 29, and 29.1 (a duplicate of Exhibit 29), which contain medical records that should have been provisionally filed as sealed documents.

2. Counsel has corrected the mistakenly filed pleadings and seeks to substitute the documents tendered with this motion in the place of ECF Document Number 284, Response to Defendants' Rule 56.1(a)(2) Statement, Document Number 285, Plaintiffs' Rule 56.1(a)(2) Statement of Uncontested Facts, and Document Number 286, Plaintiffs' Memorandum on Cross-Motions for Summary Judgment.

3. Counsel also seeks to substitute for ECF Document Numbers 287, 288, and 289, the two volumes of exhibits tendered with this motion. Plaintiffs respectfully requests that Document Number 287, 288, and 289 be stricken from the record to correct counsel's error in not seeking to file under seal Exhibits 26, 29, and 29.1 (which was a duplicate of Exhibit 29 and is not part of the final submissions).

4. Plaintiffs' undersigned counsel has shared the corrected documents with counsel for defendants and reports that defendants do not oppose this motion.

5. Plaintiffs' undersigned counsel apologizes for the above-described errors and, with the agreement of defendants, proposes that the Court adjust the briefing schedule as follows: defendants' combined reply/response due by September 1, 2025; plaintiffs' reply due by September 23, 2025.

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