

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

BEN BAKER and CLARISSA GLENN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 16 C 8940
)	
CITY OF CHICAGO, Former CHICAGO)	Judge Franklin U. Valderrama
POLICE SERGEANT RONALD WATTS,)	
OFFICER KALLATT MOHAMMED,)	Magistrate Judge Sheila M. Finnegan
SERGEANT ALVIN JONES, OFFICER)	
ROBERT GONZALEZ, OFFICER)	
CABRALES, OFFICER DOUGLAS)	
NICHOLS, JR., OFFICER MANUEL S.)	
LEANO, OFFICER BRIAN BOLTON,)	
OFFICER KENNETH YOUNG, JR.,)	(This case is part of <i>In re: Watts</i>
OFFICER ELSWORTH J. SMITH, JR.,)	<i>Coordinated Pretrial Proceedings</i> , Master
PHILIP J. CLINE, KAREN ROWAN,)	Docket Case No. 19 C 1717)
DEBRA KIRBY, and as-yet-unidentified)	
officers of the Chicago Police Department.,)	
)	
Defendants.)	

DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL

Defendants, KALLATT MOHAMMED, joined by RONALD WATTS, ALVIN JONES, ROBERT GONZALEZ, CABRALES, DOUGLAS NICHOLS, MANUEL LEANO, BRIAN BOLTON, KENNETH YOUNG, ELSWORTH SMITH, PHILLIP CLINE, KAREN ROWAN, DEBRA KIRBY, and THE CITY OF CHICAGO, (collectively “Defendants”), by their respective attorneys, pursuant to Local Rule 26.2, hereby move the Court for leave to file under seal their motion to bar Plaintiff’s expert Shairee Lackey (“Ms. Lackey”) pursuant to *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993).

1. Plaintiffs disclosed Ms. Lackey as a non-retained expert to testify “concerning her clinical observations, diagnoses, and treatment of Ms. Glenn, including the diagnosis that Ms. Glenn suffers from PTSD as a result of the wrongdoing at issue in this case.” Ms. Lackey’s interaction with Ms. Glenn in

June 2022 is reflected in an Initial Assessment note from Friend Family Health Center. The Initial Assessment note has been designated as “confidential” under the operative protective order in this case, and the parties have agreed that the deposition testimony of Ms. Glenn and Ms. Lackey related to the matters reflected in the Initial Assessment note shall be treated as confidential.

2. Defendants therefore request leave to file the full version of their motion to bar and exhibits under seal. Plaintiffs do not oppose the motion.

3. Pursuant to the applicable Local Rules, defendants will file their motion and exhibits provisionally under seal and will file a redacted version (redacting those portions that reference specific information in the Initial Assessment note or testimony concerning that information) on the public docket.

WHEREFORE, Defendants request that this Court enter an order granting them leave to file their motion to bar Shairee Lackey as a witness under seal, and for such other relief as the Court deems necessary.

Respectfully submitted,

/s/ Sean M. Sullivan #6191677

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CERTIFICATE OF SERVICE

I, Sean M. Sullivan, an attorney, certify that I caused a true copy of the foregoing **Defendants' Motions for Leave to File Under Seal** to be served upon all counsel of record by electronic mail and the Court's ECF system on June 10, 2024.

/s/ Sean M. Sullivan
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