

**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  
SEAN M. SULLIVAN

Eric S. Palles  
Sean M. Sullivan  
Yelyzaveta (Lisa) Altukhova  
Mohan Groble Scolaro, P.C.  
55 W. Monroe St., Suite 1600  
Chicago, IL 60603  
(312) 422-9999  
*Counsel for Defendant Kallatt Mohammed*

/s/ William E. Bazarek (with permission)

Andrew M. Hale  
William E. Bazarek  
Anthony Zecchin  
Kelly M. Olivier  
Jason Marx  
Hannah Beswick-Hale  
Hale & Monico LLC  
53 W. Jackson Blvd.  
Suite 334  
Chicago, IL 60604  
312-494-1000

*Counsel for Defendants Alvin Jones, Robert  
Gonzalez, Miguel Cabrales, Douglas  
Nichols, Jr., Manuel Leano, Brian Bolton,  
Kenneth Young, Jr., and Elsworth Smith,  
Jr.*

/s/ Daniel M. Noland (with permission)

Terrence M. Burns  
Daniel M. Noland  
Paul A. Michalik  
Elizabeth A. Ekl  
Katherine C. Morrison  
Dhaviella N. Harris  
Burns Noland LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
312-982-0090

*Counsel for Defendants City of Chicago, Philip  
Cline, Debra Kirby and Karen Rowan*

/s/ Brian P. Gainer (with permission)

Brian P. Gainer  
Lisa McElroy  
JOHNSON & BELL, LTD.  
33 W. Monroe Street, Suite 2700  
Chicago, IL 60603  
Tel: (312) 372-0770  
Fax: (312) 372-9818  
gainerb@jbltd.com  
mcelroyl@jbltd.com  
*Counsel for Defendant Ronald Watts*

**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, 204.

\_\_\_\_\_  
/s/ Sean M. Sullivan  
Sean M. Sullivan