

**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)
POLICE SERGEANT RONALD WATTS,)
OFFICER KALLATT MOHAMMED,)
SERGEANT ALVIN JONES, OFFICER)
ROBERT GONZALEZ, OFFICER)
CABRALES, OFFICER DOUGLAS)
NICHOLS, JR., OFFICER MANUEL S.)
LEANO, OFFICER BRIAN BOLTON,)
OFFICER KENNETH YOUNG, JR.,)
OFFICER ELSWORTH J. SMITH, JR.,)
PHILIP J. CLINE, KAREN ROWAN,)
DEBRA KIRBY, and as-yet-unidentified)
officers of the Chicago Police Department,)
Defendants.)
(This case is part of *In re: Watts Coordinated
Pretrial Proceedings*, Master Docket Case No.
19 C 1717)

DEFENDANTS' MOTION FOR LEAVE TO FILE EXCESS PAGES (UNOPPOSED)

Defendants, for their unopposed motion for leave to file an oversized pleading entitled “Defendants’ Motion *in Limine* to Bar Jeffrey Danik,” state:

1. Defendants' Motion *in Limine* to Bar Jeffrey Danik is due June 10, 2024. (Dkt. 270).
2. Defendants' Motion *in Limine* to Bar Jeffrey Danik consists of 19 pages, which exceeds [REDACTED] pages the 15-page limit set by Local Rule.

3. The 19 pages were required to address the various opinions in Jeffrey Danik's Expert Report, the case law and applicable rules, and the multiple reasons defendants' contest support barring his opinions. No prejudice will be suffered by any party as a result of the requested extension. (Defendants' Motion *in Limine* to Bar Jeffrey Danik is attached hereto as Exhibit A.)

4. Counsel for Defendants conferred with Plaintiffs' counsel regarding this motion.

Plaintiffs' counsel indicated the motion could be presented as unopposed.

WHEREFORE, Defendants respectfully request leave of court to file its oversized Motion *in Limine* to Bar Jeffrey Danik, consisting of 19 pages, as well as any other relief this Court deems appropriate.

Respectfully submitted,

/s/ William E. Bazarek
Special Assistant Corporation Counsel

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

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

/s/ Brian P. Gainer
Special Assistant Corporation Counsel

Brian P. Gainer
Monica Burkoth
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, IL 60603
312-372-0770

Attorneys for Defendant Ronald Watts

/s/ Daniel M. Noland
Special Assistant Corporation Counsel

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

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

/s/ Eric S. Palles
Special Assistant Corporation Counsel

Eric S. Palles
Sean M. Sullivan
Yelyzaveta Altukhova
Raymond H. Groble III
Mohan Groble Scolaro, P.C.
55 W. Monroe St.
Suite 1600
Chicago, IL 60603
312-422-5533

Attorneys for Defendant Kallatt Mohammed

CERTIFICATE OF SERVICE

I hereby certify that on **June 10, 2024**, I electronically filed the foregoing **Defendants Motion for Leave to File Excess Pages (Unopposed)** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to counsel of record.

s/ Daniel M. Noland
