

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS) Dkt. 19-cv-1717
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS FILING RELATES TO CASE NUMBER 16-cv-8940

**UNOPPOSED MOTION TO CONSOLIDATE *DAUBERT* RESPONSE
AS TO DR. JON SHANE**

Plaintiffs Ben Baker and Clarissa Glenn move the Court to allow them to file a consolidated *Daubert* response to Defendants' *Daubert* motions to bar opinions from Plaintiffs' expert, Dr. Jon Shane. In support, Plaintiffs state as follows.

1. Plaintiffs' disclosed experts include Dr. Jon Shane, who disclosed a report offering opinions about the police practices relating to the arrests of Plaintiffs Ben Baker, Clarissa Glenn, Lionel White, and Leonard Gipson, and more broadly relating to *Monell* opinions on the City of Chicago's policies and practices.
2. On May 30, 2024, the Court granted the City of Chicago's motion to adjust the schedule for filing *Daubert* motions against Dr. Shane. *Daubert* motions directed at Dr. Shane are due on June 24, 2024; Plaintiffs' response on July 15, 2024; and Defendants' reply by 7/29/24. [Dkt. 741 ("Given Plaintiffs do not oppose Defendants' request that the same deadlines apply to both Monell experts, the Court grants Defendants' request that

Defendants' Daubert motion as to Plaintiffs' Monell expert Dr. Shane is also due on 6/24/2024.”]¹

3. Defendants filed joint *Daubert* motions for all experts other than Dr. Shane. With respect to Dr. Shane, the Defendants have indicated that they intend to file two separate motions. On June 10, 2024, the Individual Defendants filed a motion to bar certain of Dr. Shane's opinions. [Dkt. 758.] It is Plaintiffs' understanding that the City of Chicago will file its own separate motion aimed at Dr. Shane's opinions on the June 24 deadline. Plaintiffs anticipate that the Individual Defendants' motion and the City's forthcoming motion will raise similar issues, and that judicial economy will be served by allowing a consolidated reply.
4. Plaintiffs believe that the Court's previous order [Dkt. 741] contemplates that Plaintiffs' responses to all *Daubert* motions to bar Dr. Shane's opinions be due July 15, 2024. To remove any uncertainty, Plaintiffs request the Court grant them leave to file a consolidated response to all *Daubert* motions against Dr. Shane by July 15, 2024, with all Defendants' replies due July 29, 2024.
5. Plaintiffs have conferred with Defendants, who do not oppose this motion.

WHEREFORE, Plaintiffs request that the Court enter an order permitting Plaintiff to file a consolidated response to all *Daubert* motions against Dr. Shane by July 15, 2024, with all Defendants' replies due July 29, 2024.

Respectfully submitted,

/s/ Wally Hilke
One of Plaintiffs' Attorneys

¹ Docket citations are to the docket in Case No. 19-cv-1717.

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