

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BEN BAKER AND CLARISSA GLENN,

Plaintiffs,

v.

CITY OF CHICAGO, ET AL.,

Defendants.

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Case No. 16 CV 8940

Judge Franklin U. Valderrama

Magistrate Judge Shelia M. Finnegan

(This case is part of *In re: Watts Coordinated Pretrial Proceedings*, Master Docket No. 19-cv-1717)

**DEFENDANTS' UNOPPOSED MOTION FOR
LEAVE TO FILE EXCESS PAGES**

Defendants City of Chicago, Philip Cline, Debra Kirby, and Karen Rowan, by and through their undersigned counsel respectfully move this Court for leave to file an oversized Motion to Bar Jon M. Shane's *Monell* Opinions. In support of their motion, Defendants state as follows:

1. Defendants' Motion to Bar Jon M. Shane's *Monell* Opinions is due June 24, 2024. Dkt. No. 289.
2. Shane's opinions are contained in his 125-page report (not inclusive of appendices). The majority of Shane's report addresses his criticisms of the City's policies under *Monell*. The report was filed under seal as part of an earlier motion at Dkt. No. 304-2.
3. Defendants' Motion, attached hereto as Exhibit A, is twenty-five (25) pages in length.
4. To comply with the local rules, Defendants are requesting leave to file this oversized brief, including ten additional pages that are necessary to fully address the issues raised in Shane's report.
5. Plaintiffs do not oppose the requested relief.

WHEREFORE, Defendants respectfully request an order granting them leave to file its oversized Motion to Bar Jon M. Shane's *Monell* Opinions, consisting of twenty-five (25) pages.

Dated: June 24, 2024

Respectfully submitted,

MARY B. RICHARDSON-LOWRY
Corporation Counsel of the City of Chicago

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CERTIFICATE OF SERVICE

I hereby certify that on **June 24, 2024**, I electronically filed the foregoing **Defendants' Unopposed Motion for Leave to File Excess Pages** 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
