

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 19-cv-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS DOCUMENT RELATES TO CASE NO. 16-CV-8940

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE INSTANTER
THEIR RESPONSE TO DEFENDANTS' DAUBERT MOTION TO BAR
JEFFREY DANIK AND RELATED EXHIBITS UNDER SEAL

Plaintiffs respectfully request leave to file their Response to Defendants Motion to Bar Expert Jeffrey Danik and related exhibits under seal pursuant to Local Rule 26.2, stating in support as follows:

1. Plaintiffs' response brief in opposition to Defendants' motion to bar Mr. Danik from testifying relates to and discusses contain confidential information derived from the FBI investigation of Watts and Mohammed, including deposition testimony, that are attached as exhibits.
2. When the FBI produced the relevant investigation records in this litigation, the records were marked as Confidential under the Privacy Act Order in this case. *See* Dkts. 3 & 84 in Case No. 19-cv-1717.
3. Plaintiffs therefore seek to file a complete version of the brief and exhibits under seal.
4. Pursuant to Local Rule 26.2, Plaintiffs will file a public version of their Motion with redactions of the confidential information and will provisionally file the Motion and exhibits electronically under seal.

5. Plaintiffs conferred with defense counsel, who indicated that this motion is unopposed.

Respectfully submitted,

/s/ Wallace Hilke

One of the attorneys for the Plaintiffs

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