

**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' JOINT UNOPPOSED MOTION FOR LEAVE TO FILE PORTIONS OF  
DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION TO BAR OR LIMIT  
TESTIMONY OF DEFENDANTS' EXPERT WITNESS MICHAEL BROWN AND  
EXHIBITS UNDER SEAL**

Defendants, City of Chicago, Philip Cline, Debra Kirby, Karen Rowan, Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel Leano, Brian Bolton, Kenneth Young, Jr., Elsworth Smith, Jr., Ronald Watts and Kallatt Mohammed for their Motion for Leave to File Portions of Defendants' Response to Plaintiffs' Motion to Bar or Limit Testimony of Defendants' Expert Witness Michael Brown, state:

1. A Confidentiality Order, Agreed Privacy Act Order, and Amended Confidentiality Order have been entered in the *Coordinated Pretrial Proceedings*, Dkts. 3, 29, 57.

2. Defendants' Response cites, refers to, and attaches documents and materials that have been designated as "Confidential" and/or subject to the aforementioned confidentiality and Privacy Act orders, including Exhibits 1-3.

3. Pursuant to Local Rule 26.2, Defendants will file a public version of Defendants' Response with redactions and without Exhibits 1-3, and will provisionally file an unredacted copy of Defendants' Response, in addition to Exhibits 1-3, under seal.

4. Defendants' counsel conferred with counsel for Plaintiffs and they indicated that they do not oppose this motion.

WHEREFORE, Defendants respectfully request this Court grant their motion for leave to file an unredacted copy of Defendants' Response to Plaintiffs' Motion to Bar or Limit Testimony of Defendants' Expert Witness Michael Brown, and Exhibits 1-3 to said Response, under seal.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on **July 1, 2024**, I electronically filed the foregoing **Defendants' Unopposed Motion for Leave to File Under Seal** 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*

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