

EXHIBIT 4

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

BEN BAKER and CLARISSA GLENN,	)	
	)	
Plaintiffs,	)	
	)	Case No. 16 C 08940
v.	)	
	)	Judge Franklin U. Valderrama
CITY OF CHICAGO, et al.,	)	
	)	Magistrate Judge Sheila M. Finnegan
Defendants.	)	
	)	<i>(This case is part of In re: Watts</i>
	)	<i>Coordinated Pretrial Proceedings,</i>
	)	<i>Master Docket Case No. 19 C 1717)</i>
	)	

DEFENDANTS' RULE 26(A)(2) DISCLOSURES

Defendants, City of Chicago, Philip Cline, Debra Kirby and Karen Rowan, by their attorneys, Burns Noland LLP, make the below disclosure pursuant to Federal Rule of Civil Procedure 26(a)(2):

FRCP 26(a)(2)(B)

Retired FBI Supervisory Special Agent Michael Brown

Mr. Brown will provide expert testimony as reflected in his report dated May 13 2024, attached hereto and Bates stamped CITY-BG-062879 – 062915. Mr. Brown's Curriculum Vitae is attached hereto and Bates-stamped CITY-BG-062916 – 062928.

Mr. Brown's compensation for research, case analysis, review and report is \$350 an hour, compensation for depositions, hearings and trial testimony will be charged at \$2,800 per day, as well as necessary travel expenses.

In addition to the *Waddy v. City* case, Mr. Brown provided deposition testimony as an expert in the last four years in the following cases: Velez v City of Chicago 18 C 8144 (N.D.Ill), and Walker v City of Chicago, 20 C 7209 (N.D.Ill).

Rule 26(a)(2)(C) Disclosures of Opinion Witnesses Who Do Not Provide a Report

Lt. Michael Fitzgerald (can be contacted through counsel for Defendant City)

To the extent considered opinion testimony, the subject matter on which Lt. Fitzgerald may provide evidence under Federal Rule of Evidence 702, 703, or 705, as well as a summary of the

facts and opinions to which he is expected to testify, will be consistent with his March 6, 2024 Rule 30(b)(6) deposition testimony in *In re: Watts Coordinated Proceedings*, Case No. 19 C 1717. Specifically, Lt. Fitzgerald may testify concerning the following: the preparation and approval of arrest reports, vice case reports, and inventory reports, including who should be listed in the reports, who should sign the reports, and the use of quotation marks and/or abbreviations in the reports, and the Chicago Police Department's training in that regard; rules, policies, and orders applicable to the preparation of Chicago Police Department reports; completion of a Complaint for Preliminary Examination; qualifications to become a member of a tactical team in the Chicago Police Department, including the process for selecting members; the day to day responsibilities of tactical teams in the Chicago Police Department, including pre-planned narcotics enforcement missions; Department rules, policies, procedures, and orders applicable to tactical teams in the 1999 to 2011 time frame; the day to day responsibilities of sergeants overseeing tactical teams in the Chicago Police Department; and, the process for collecting, inventorying, and requesting testing of suspected narcotics evidence, and the collection and inventorying of money, including the process and paperwork for maintaining the chain of custody under CPD policy and in this case.

Evidence Technician John Heneghan (can be contacted through counsel for Defendant City)

To the extent considered opinion testimony, the subject matter on which Evidence Technician Heneghan may provide evidence under Federal Rule of Evidence 702, 703, or 705, as well as a summary of the facts and opinions to which he is expected to testify, will be consistent with his November 7, 2023 City representative deposition in *Waddy v. City, et al.*, 19 L 10035. Specifically, Evidence Technician Heneghan may testify concerning the following: the Chicago Police Department's policies and practices at all times relevant to this case regarding fingerprinting of evidence in narcotics cases, including but not limited to fingerprinting packages and or baggies that contain alleged narcotics.

Defendants City of Chicago, Philip Cline, Debra Kirby and Karen Rowan, adopt the Rule 26(a)(2) disclosures made by the individual defendants in this matter.

Respectfully submitted,

s/ Daniel M. Noland

Special Assistant Corporation Counsel

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*Attorneys for Defendants,
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Karen Rowan*

CERTIFICATE OF SERVICE

I hereby certify that on **May 13, 2024**, I served the foregoing **Rule 26(A)(2) Disclosures** to counsel of record via electronic delivery.

s/ Heather Barhorst _____