

**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 MOTION FOR LEAVE TO FILE PORTIONS OF THEIR
JOINT REPLY IN SUPPORT OF MOTION TO BAR EXPERT WITNESS JEFFREY
DANIK UNDER SEAL (*UNOPPOSED*)**

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 Unopposed Motion for Leave to File Portions of Defendants' Joint Reply in Support of Their Motion to Bar Jeffrey Danik Under Seal, 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' Reply cites and refers to documents and information that have been designated as "Confidential" and/or subject to the aforementioned Confidentiality and Privacy Act orders.

3. Pursuant to Local Rule 26.2, Defendants will file a public version of Defendants' Joint Reply with redactions, and will provisionally file an unredacted copy of Defendants' Joint Reply under seal.

4. Defendants' counsel conferred with counsel for Plaintiffs, who 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' Joint Reply in Support of Their Motion to Bar Jeffrey Danik under seal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on **July 15, 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/ Paul A. Michalik
