

**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,

/s/ William E. Bazarek
Special Assistant Corporation Counsel

Andrew M. Hale
William E. Bazarek
Anthony Zecchin
Kelly M. Olivier
Jason Marx
Hannah Beswick-Hale
Hale & Monico LLC
53 W. Jackson Blvd.
Suite 334
Chicago, IL 60604
312-494-1000

*Attorneys for Defendants Alvin Jones,
Robert Gonzalez, Miguel Cabrales,
Douglas Nichols, Jr., Manuel Leano, Brian
Bolton, Kenneth Young, Jr., and Elsworth
Smith, Jr.*

/s/ Paul A. Michalik
Special Assistant Corporation Counsel

Terrence M. Burns
Daniel M. Noland
Paul A. Michalik
Elizabeth A. Ekl
Katherine C. Morrison
Dhaviella N. Harris
Burns Noland LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606
312-982-0090

*Attorneys for Defendants City of Chicago, Philip
Cline, Debra Kirby and Karen Rowan*

/s/ Brian P. Gainer
Special Assistant Corporation Counsel

Brian P. Gainer
Monica Burkoth
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, IL 60603
312-372-0770

Attorneys for Defendant Ronald Watts

/s/ Eric S. Palles
Special Assistant Corporation Counsel

Eric S. Palles
Sean M. Sullivan
Yelyzaveta Altukhova
Raymond H. Groble III
Mohan Groble Scolaro, P.C.
55 W. Monroe St.
Suite 1600
Chicago, IL 60603
312-422-5533

Attorneys for Defendant Kallatt Mohammed

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
