

**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

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE  
INSTANTER THEIR DAUBERT REPLY BRIEF UNDER SEAL**

Plaintiffs respectfully request leave to file their Reply in Support of their Motion to Bar or Limit Certain Testimony of Defendants' Expert Witness Michael Brown under seal ("Brown Reply") pursuant to Local Rule 26.2, stating in support as follows:

1. In Plaintiffs' Brown Reply, they reference information that was derived from the FBI investigation of Watts and Mohammed, including confidential information.
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. Therefore, Plaintiffs seek leave to file their Brown Reply under seal to comply with the Confidentiality Order and Privacy Act Order. Dkts. 3 & 84 in Case No. 19-cv-1717.
4. Pursuant to Local Rule 26.2, Plaintiffs will file a public version of their Reply with redactions of the confidential information and will provisionally file the Reply electronically under seal.
5. Because Mr. Brown is an expert for the City, Plaintiffs' counsel conferred with counsel for Defendant City, and they indicated that they do not oppose this motion.

6. For the foregoing reasons, Plaintiffs respectfully move this Honorable Court to grant their motion for leave to file their Reply in Support of their Motion to Bar or Limit Certain Testimony of Defendants' Expert Witness Michael Brown under seal.

Respectfully submitted,

/s/ Gianna Gizzi  
*One of the attorneys for the Plaintiffs*

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2024, I electronically filed the foregoing **Plaintiffs' Unopposed Motion for Leave to File Instantly their Reply Brief 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/ Gianna Gizzi