

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BEN BAKER AND CLARISSA GLENN,

Plaintiffs,

v.

CITY OF CHICAGO, *et al.*,

Defendants.

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Case No. 16 CV 8940

Judge Franklin U. Valderrama

Magistrate Judge Shelia M. Finnegan

(This case is part of *In re: Watts Coordinated Pretrial Proceedings*, Master Docket No. 19-cv-1717)

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE AN OVERSIZED
REPLY IN SUPPORT OF MOTION TO BAR JON M. SHANE'S *MONELL* OPINIONS**

Defendants City of Chicago, Philip Cline, Debra Kirby, and Karen Rowan, by and through their undersigned counsel respectfully move this Court for leave to file an oversized Reply in Support of their Motion to Bar Jon M. Shane's *Monell* Opinions. In support of their motion, Defendants state as follows:

1. Defendants' Reply in Support of their Motion to Bar Jon M. Shane's *Monell* Opinions is due July 29, 2024.

2. Shane's opinions are contained in his 125-page report (not inclusive of appendices). The majority of Shane's report addresses his criticisms of the City's policies under *Monell*. The report was filed under seal as part of an earlier motion at Dkt. No. 304-2.

3. Plaintiffs' Combined Response to Defendants' Motions to Bar Jon M. Shane's Opinions was forty-four (44) pages. Dkt. No. 366.

4. Defendants' Reply, attached hereto as Exhibit A, is twenty-nine (29) pages in length.

5. To comply with the local rules, Defendants are requesting leave to file this oversized brief, including 14 additional pages that are necessary to fully address the issues raised in Shane's report.

6. Plaintiffs do not oppose the requested relief.

WHEREFORE, Defendants respectfully request an order granting them leave to file its oversized Reply in Support of their Motion to Bar Jon M. Shane's *Monell* Opinions, consisting of twenty-nine (29) pages.

Dated: July 29, 2024

Respectfully submitted,

MARY B. RICHARDSON-LOWRY
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Attorneys for Defendants City of Chicago, Philip Cline, Debra Kirby, and Karen Rowan

CERTIFICATE OF SERVICE

I hereby certify that on **July 29, 2024**, I electronically filed the foregoing **Defendants' Unopposed Motion for Leave to File An Oversized Reply in Support of their Motion to Bar Jon M. Shane's Monell Opinions** 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
