

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

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|---|---|---|
| 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 Coordinated</i> |
| OFFICER ELSWORTH J. SMITH, JR.,             | ) | <i>Pretrial Proceedings</i> , Master Docket Case No.  |
| PHILIP J. CLINE, KAREN ROWAN,               | ) | 19 C 1717)  |
| DEBRA KIRBY, and as-yet-unidentified        | ) |   |
| officers of the Chicago Police Department., | ) |   |
|   | ) |   |
| Defendants.                                 | ) |   |

**DEFENDANT CITY OF CHICAGO'S MOTION FOR LEAVE TO FILE  
MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT,  
RULE 56.1 STATEMENT OF FACTS, AND EXHIBITS UNDER SEAL**

Defendant, City of Chicago (“City”), for its Motion for Leave to File its Memorandum of Law in Support of Motion for Summary Judgment, Rule 56.1 Statement of Facts, and Exhibits Under Seal, states:

1. A Confidentiality Order, Agreed Privacy Act Order, and Amended Confidentiality Order have been entered in the *Coordinated Pretrial Proceedings*, Dkts. 3, 29, 57. Those orders are applicable to this case.

2. The City’s Memorandum of Law in Support of Its Motion for Summary Judgment, its Rule 56.1 Statement of Facts, and the Exhibits that support those pleadings consist of, cite, refers to,

and attach documents and materials that have been designated as “Confidential” and/or subject to the aforementioned Confidentiality and Privacy Act orders.

3. Pursuant to Local Rule 26.2, the City will file a public version of the Memorandum of Law and Rule 56.1 Statement of Facts with redactions, and the Exhibits not subject to the aforementioned Confidentiality and Privacy Act orders, and will provisionally file an unredacted copy of its Memorandum of Law and Rule 56.1 Statement of Facts, in addition to the Exhibits, under seal.

WHEREFORE, the City respectfully requests that this Court grant the City leave to file unredacted copies of its Memorandum of Law in Support of Its Motion for Summary Judgment, its Rule 56.1 Statement of Facts, and Exhibits to said Motion, under seal.

Respectfully submitted,

MARY B. RICHARDSON-LOWRY  
Corporation Counsel, City of Chicago

By: s/ Paul A. Michalik  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **September 5, 2024**, I electronically filed the foregoing **Defendant City of Chicago's 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*

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