

**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-1717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)
) *This Document Relates to All Cases*
)

THIS FILING RELATES TO CASE NO. 16-cv-8940

**Motion for leave to file Corrected Statement of Additional Material Facts and for Leave to
File Exhibits *Instante***

Plaintiffs respectfully request leave to file a Corrected Statement of Additional Material Facts in response to Defendants' motions for summary judgment, stating in support as follows:

1. Plaintiffs filed their Statement of Additional Material Facts in response to Defendants' motions for summary judgment on October 10, 2024. Dkt. 425
2. Almost immediately after filing, as Plaintiffs were preparing to file the exhibits to their Statement of Additional Material Facts, they realized that they had inadvertently omitted the exhibit numbers for certain of the cited exhibits. Plaintiffs have corrected those omissions in their Corrected Statement of Additional Material Facts.
3. Plaintiffs have not made any substantive changes in their Corrected Statement of Additional Material Facts. Nor did they add any new exhibits. They merely added the missing exhibit numbers.
4. Plaintiffs additionally seek leave to file the exhibits to their Corrected Statement of Additional Material facts *instante*.

5. Plaintiffs have provisionally filed their Corrected Statement of Additional Material facts and their exhibits separately on the docket, under seal, pursuant to their earlier motion for leave to file under seal. Dkt. 422.

WHEREFORE, Plaintiffs request that the Court grant them leave to file their Corrected Statement of Additional Material Facts and to file their exhibits to that document *instantly*.

Respectfully Submitted,

/s/ Scott Rauscher
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