

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

LIONEL WHITE, )  
Plaintiff, ) No. 17 C 02877  
vs. ) The Honorable Sara Ellis  
CITY OF CHICAGO, et al. ) Magistrate Judge Laura K. McNally  
Defendants. )

**JOINT MOTION FOR LEAVE FOR EXCESS PARAGRAPHS AND  
TO FILE CERTAIN EXHIBITS UNDER SEAL PURSUANT TO LOCAL RULE  
26.2**

Plaintiff, Lionetta White, Special Administrator of the Estate of Lionel White, Sr., by her attorneys, Defendants Alvin Jones, Elsworth Smith, Jr., Manuel Leano, Brian Bolton, Robert Gonzalez, and Douglas Nichols, by their attorneys, and Defendant Kallatt Mohammed, by his attorneys, hereby move this Court for leave for excess paragraphs and to file certain exhibits to the Parties Joint Local Rules 56.1(a)(2) Statement of Undisputed Material Fact under seal. In support of their Motion, the Parties state as follows:

1. **Sealed exhibits to Rule 56.1 motion:** Some of the Exhibits that support the statement consist of, cite, refer to, and attach documents and materials that have been designated as “Confidential” and/or subject to the Confidentiality and Privacy Act orders that have been entered in the Coordinated Pretrial Proceedings. *See* Dkts. 3, 29, 57. These Orders are applicable to this case. As such, the Parties respectfully request leave to file the confidential exhibits under seal.

2. **Request for excess paragraphs:** The Parties have worked hard not to exceed the Court's limit of 120 paragraphs. However, due to the lengthy factual record of this case and the

numerous complex legal issues that will be raised in the pleadings, the Parties respectfully request the Court grant them leave to file a Rule 56.1 Statement consisting of 187 paragraphs.

WHEREFORE, the Parties respectfully request this Court to grant their Motion Leave for Excess Paragraphs and to File Certain Exhibits Under Seal Pursuant to Local Rule 26.2.

Dated: March 31, 2025

Respectfully Submitted,

By: /s/ Scott Rauscher  
One of Plaintiff's Attorneys

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, I electronically filed the foregoing JOINT MOTION FOR LEAVE FOR EXCESS PARAGRAPHS AND TO FILE CERTAIN EXHIBITS UNDER SEAL PURSUANT TO LOCAL RULE 26.2 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/ Amy A. Hijjawi*