

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

Lionetta White, Special Administrator of the Estate of LIONEL WHITE, SR.,	)	
	)	
	)	
Plaintiff,	)	Case No. 17 C 2877
	)	
v.	)	Judge Sara L. Ellis
	)	Magistrate Judge Laura K. McNally
CITY OF CHICAGO, RONALD WATTS,	)	
ALVIN JONES, ELSWORTH SMITH JR.,	)	
KALLATT MOHAMED, MANUEL	)	
LEANO, BRIAN BOLTON, ROBERT	)	
GONZALEZ, and DOUGLAS NICHOLS,	)	
	)	
Defendants.	)	

**DEFENDANT CITY’S MOTION FOR LEAVE TO FILE EXCESS  
PAGES AND FOR LEAVE TO FILE UNDER SEAL (*UNOPPOSED*)**

Defendant, the City of Chicago (“City”), submits this unopposed motion for leave to file oversized *Daubert* motions, including Defendants’ Joint Motion to Bar Jon M. Shane’s *Monell* Opinions and Defendants’ Joint Motion *in Limine* to Bar Jeffrey Danik, and to file under seal. In support thereof, the City states:

1. The parties’ *Daubert* motions are due to be filed March 31, 2025. Dkt. No. 221.
2. Defendants intend to jointly file two *Daubert* motions including Defendants’ Joint Motion to Bar Jon M. Shane’s *Monell* Opinions (attached hereto as Exhibit A) and Defendants’ Joint Motion *in Limine* to Bar Jeffrey Danik.
3. Plaintiff disclosed opinions by his expert, Jon M. Shane, that are critical of the City’s policies and practices and contained in a 117-page report dated April 1, 2024 (not including hundreds of pages of appendices). Shane’s opinions address complaint allegations against CPD Officers spanning twelve years (between 1999 and 2011).

4. Plaintiff disclosed opinions by his expert, Jeffrey Danik, addressing the joint investigation conducted by the CPD and FBI that are contained in a 28-page report dated April 1, 2024 (not including appendices) and a supplementary report.

5. Due to the number and complexity of the issues required to be addressed, the Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions and Joint Motion *in Limine* to Bar Jeffrey Danik exceed the page limit allowed by the local rules without leave of court.

6. The City respectfully submits that its oversized briefs, which consist of 26 pages for Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions (Ex. A) and 25 pages for Defendants' Joint Motion *in Limine* to Bar Jeffrey Danik, are warranted due to the number and complexity of the legal issues.

7. As to the request to file under seal, a Confidentiality Order, Agreed Privacy Act Order, and Amended Confidentiality Order have been entered in the Coordinated Pretrial Proceedings, Dkt Nos. 3, 29, 57. Those orders are applicable to this case.

8. Defendants' Joint Motion to Bar Jeffrey Danik's Opinions, and the Exhibits that support those pleadings consist of, cite, refer to, and attach documents and materials that have been designated "Confidential" and/or subject to the aforementioned Confidentiality and Privacy Act orders.

9. Pursuant to Local Rule 26.2, the City will file a public version of Defendants' Joint Motion to Bar Jeffrey Danik's Opinions with the necessary redactions, as well as the Exhibits not subject to the aforementioned Confidentiality and Privacy Act orders and will provisionally file an unredacted copy of the motion and its respective exhibits under seal. The City also respectfully requests leave to file the redacted version of the documents within 14 days of the ruling on this Motion.

10. Undersigned counsel for the City conferred with Plaintiff's counsel regarding the motion. Plaintiff's counsel indicated the motion could be presented as unopposed.

WHEREFORE, Defendant, City of Chicago, respectfully requests leave of court to file Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions, consisting of 26 pages and Defendants' Motion *in Limine* to Bar Jeffrey Danik, consisting of 25 pages. In addition, the City respectfully requests that this Court grant the City leave to file unredacted copies of Defendants' Joint Motion to Bar Jeffrey Danik's Opinions, and the Exhibits that support that motion under seal and the to file the redacted versions of the documents within 14 days of the ruling on this Motion.

Respectfully submitted,

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Corporation Counsel, City of Chicago

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**CERTIFICATE OF SERVICE**

I hereby certify that on **March 31, 2025**, I electronically filed the foregoing **Defendant City's Motion for Leave to File Excess Pages and For Leave to File Under Seal (*Unopposed*)** 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/ Elizabeth A. Ekl*

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