

**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.)	

**JOINT MOTION FOR LEAVE TO FILE JOINT STATEMENT OF FACTS UNDER
SEAL**

Defendant, the City of Chicago (“City”), and plaintiff, Lionetta White, Special Administrator of the Estate of Lionel White, Sr., submit this joint motion for leave to file their joint statement of undisputed material facts, pursuant to L.R. 56.1(a)(2) under seal, and in support thereof, state:

1. Motions for summary judgment and joint statements of undisputed material facts are due to be filed March 31, 2025. Dkt. No. 221.
2. Defendant City intends to file its motion for summary judgment today. Pursuant to this Court’s standing order, the parties have prepared their joint statement of undisputed material facts, pursuant to L.R. 56.1(a)(2).
3. 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.

4. The parties joint statement of undisputed facts and the Exhibits that support it consist of, cite, refer to, and attach certain documents and materials that have been designated “Confidential” and/or subject to the aforementioned Confidentiality and Privacy Act orders.

5. Pursuant to Local Rule 26.2, the parties will file a public version of their joint statement of undisputed material facts 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 joint statement and its respective exhibits under seal. The parties also respectfully request leave to file the redacted version of the documents within 14 days of the ruling on this Motion.

WHEREFORE, plaintiff and defendant, City of Chicago, respectfully request that this Court grant leave to file unredacted copies of the joint statement of undisputed material facts, and the Exhibits that support that joint statement, under seal and to file the redacted versions of the documents within 14 days of the ruling on this Motion.

Respectfully submitted,

/s/ Scott Rauscher

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CERTIFICATE OF SERVICE

I hereby certify that on **March 31, 2025**, I electronically filed the foregoing **Joint 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/ Daniel M. Noland
