

**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
CITY OF CHICAGO, RONALD WATTS,)	
ALVIN JONES, ELSWORTH SMITH JR.,)	Magistrate Judge Laura K. McNally
KALLAT MOHAMED, MANUEL)	
LEANO, BRIAN BOLTON, ROBERT)	
GONZALEZ, and DOUGLAS NICHOLS,)	
)	
Defendants.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **Thursday, April 3, 2025 at 1:45 p.m.**, or as soon thereafter as counsel may be heard, we shall appear before the **Honorable Sara L. Ellis** in **Room 1403** of the United States District Court for the Northern District of Illinois, Eastern Division, 219 South Dearborn Street, Chicago, Illinois and shall then and there present the attached **Joint Motion for Leave to File Joint Statement of Facts Under Seal**.

Respectfully submitted,

/s/ Scott Rauscher

/s/ Daniel M. Noland

Special Assistant Corporation Counsel

Jon Loevy
Scott Rauscher
Tess Kleinhaus
Joshua A. Tepfer
Sean Starr
Loevy & Loevy
311 N. Aberdeen, 3rd Floor
Chicago, IL 60607

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Elizabeth A. Ekl
Katherine C. Morrison
Dhaviella N. Harris
Burns Noland LLP
311 S. Wacker Dr., Suite 5200
Chicago, IL 60606

Joel Flaxman
Law Offices of Kenneth N. Flaxman P.C.
200 S Michigan Ave, Ste 201
Chicago, IL 60604

Attorneys for Defendant City of Chicago

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on **April 1, 2025**, I electronically filed the foregoing **Notice of Motion** 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