

**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,)	
)	
v.)	Case No. 17 C 2877
)	
CITY OF CHICAGO, RONALD WATTS,)	Judge Sara L. Ellis
ALVIN JONES, ELSWORTH SMITH JR.,)	
KALLATT MOHAMED, MANUEL)	
LEANO, BRIAN BOLTON, ROBERT)	
GONZALEZ, and DOUGLAS NICHOLS,)	
)	
Defendants.)	

**DEFENDANT CITY'S UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES
AND TO FILE UNDER SEAL**

Defendant, City of Chicago (“City”), by and through its undersigned counsel, respectfully moves this Court for leave to file excess pages for Defendants’ response to Plaintiff’s *Daubert* motion to exclude the opinions of Jeffrey Noble, and for leave to file Exhibit 2 to Defendants’ response to Plaintiff’s sealed motion to bar or limit certain testimony of Defendants’ Expert Witness Michael Brown under seal. In support of their motion, Defendants state as follows:

1. Defendants’ Responses to Plaintiff’s *Daubert* motions are due May 1, 2025. Dkt. No. 221.
2. Plaintiff’s *Daubert* Motion to Exclude the Opinions of Jeffrey Noble (Dkt. #227) is twenty-five (25) pages.
3. Defendants’ Response in Opposition to Plaintiff’s *Daubert* Motion to Exclude the Opinions of Jeffrey Noble is twenty-nine (29) pages in length.

4. To comply with the local rules, Defendant City is requesting leave to file an oversized response, with up to 14 additional pages, that are necessary to fully address the issues raised in Plaintiff's *Daubert* Motion to Exclude the Opinions of Jeffrey Noble.

5. 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.

6. Exhibit 2 to Defendants' Response in Opposition to Plaintiff's Motion to Bar or Limit Certain Testimony of Defendants' Expert Witness Michael Brown was designated "Confidential" and/or subject to the aforementioned Confidentiality and Privacy Act orders, and Defendants request leave to file that exhibit under seal.

7. Defendants' counsel have conferred with Plaintiff's counsel, who do not oppose the requested relief.

WHEREFORE, Defendant, City of Chicago, respectfully requests an order granting Defendants leave to file an oversized Response to Plaintiff's *Daubert* motion to exclude the opinions of Jeffrey Noble, consisting of twenty-nine (29) pages, and for leave to file Exhibit 2 to Defendants' response to Plaintiff's sealed motion to bar or limit certain testimony of Defendants' Expert Witness Michael Brown under seal.

May 1, 2025

Respectfully submitted,

By: /s/ Daniel M. Noland
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