

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,) Magistrate Judge Laura K. McNally
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 (*UNOPPOSED*)**

Defendant, the City of Chicago (“City”), submits this unopposed motion for leave to file an oversized Reply in Support of Defendants’ Joint Motion to Bar Jon M. Shane’s *Monell* Opinions. In support thereof, the City states:

1. The parties' replies in support of *Daubert* motions are due to be filed May 22, 2025.
Dkt. No. 221.
2. Defendants intend to jointly file Defendants' Reply in Support of Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions (attached hereto as Exhibit A).
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. Due to the number and complexity of the issues required to be addressed, the Reply in Support of Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions exceeds the page limit allowed by the local rules without leave of court.

5. The City respectfully submits that its oversized brief, which consists of 29 pages for Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions (Ex. A), is warranted due to the number and complexity of the legal issues.

6. To comply with the local rules, Defendant City is requesting leave to file an oversized reply in support, with up to 14 additional pages, that are necessary to fully address the issues raised in Plaintiff's Response to Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions.

7. 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 29 pages.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on **May 22, 2025**, I electronically filed the foregoing **Defendant City's Motion for Leave to File Excess Pages (*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* _____