

**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.,)	
KALLATT MOHAMED, MANUEL)	
LEANO, BRIAN BOLTON, ROBERT)	
GONZALEZ, and DOUGLAS NICHOLS,)	
)	
Defendants.)	

**MOTION FOR LEAVE TO FILE RESPONSE TO PLAINTIFF'S SEALED
STATEMENT OF ADDITIONAL MATERIAL FACTS UNDER SEAL (*UNOPPOSED*)**

Defendant, City of Chicago ("City"), submits this Motion for Leave to File its Response to Plaintiff's Sealed Statement of Additional Material Facts Under Seal, and in support thereof, states:

1. Defendant City's Response to Plaintiff's Sealed Statement of Additional Material Facts is due to be filed May 22, 2025. Dkt. No. 221.

2. 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.

3. Defendant City's Response to Plaintiff's Statement of Additional Material 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.

4. Pursuant to Local Rule 26.2, the City will file a public version of its Response to Plaintiff's Statement of Additional Material Facts with the necessary redactions, and will provisionally

file an unredacted copy of the response under seal. The City also respectfully requests leave to file the redacted version of the response within 14 days of the ruling on this Motion.

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

WHEREFORE, Defendant, City of Chicago, respectfully requests that this Court grant leave to file an unredacted copy of its Response to Plaintiff's Statement of Additional Material Facts under seal and to file the redacted version within 14 days of the ruling on this Motion.

Respectfully submitted,

/s/ Daniel M. Noland
Special Assistant Corporation Counsel

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
Attorneys for Defendant City of Chicago

CERTIFICATE OF SERVICE

I hereby certify that on **May 22, 2025**, I electronically filed the foregoing **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
