

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM CARTER,)	
)	
<i>Plaintiffs,</i>)	
)	
V.)	Case No. 17 C 7241
)	
CITY OF CHICAGO, RONALD WATTS,)	Judge Lashonda A. Hunt
DARRYL EDWARDS, ALVIN JONES,)	
KALLATT MOHAMMED, JOHN)	
RODRIGUEZ, CALVIN RIDGELL, JR.,)	
ELSWORTH J. SMITH, JR., GEROME)	
SUMMERS, JR., AND KENNETH YOUNG,)	
JR.,)	
)	
<i>Defendants.</i>)	

**DEFENDANT CITY’S MOTION TO WITHDRAW REQUEST FOR
LEAVE TO FILE EXHIBIT UNDER SEAL (UNOPPOSED)**

Defendant, the City of Chicago (“City”), submits this unopposed motion to withdraw its request for leave to file exhibit under seal. In support thereof, the City states:

1. On February 10, 2025, the City filed an unopposed Motion for Leave to File Excess Page and for Leave to File Exhibits Under Seal. (Dkt. 241). The motion sought leave to file a 25-page reply brief and to file Group Exhibit 11 to the reply under seal. (Group Exhibit 11 was produced in discovery by the City subject to a Confidentiality Order in an unredacted format). The Court granted the City’s request for excess pages but reserved ruling regarding the City’s request to file Group Exhibit 11 under seal subject to the City’s compliance with Local Rule 26.2 and the Court’s prior order to file a redacted public version of the exhibit on the docket. Dkt. 243.

2. Due to a page numbering error in the proposed reply brief (attached as Ex. A to Dkt. No. 241), the City’s Motion for Leave to File Excess Pages incorrectly stated the oversized

reply brief consists of 25 pages. The Corrected Reply in Support of Defendants' Joint Motion to Bar Jon M. Shane's Monell Opinions consists of 22 pages.

3. Because the Court previously granted the City's request to file an oversized reply consisting of 25 pages (Dkt. 243), Defendants will file a *Corrected* Reply in Support of Defendants' Joint Motion to Bar Jon M. Shane's Monell Opinions as a separate docket entry. No changes other than correction of the pages numbers have been made in the corrected reply.

4. In accordance with this Court's February 11 Order, the City prepared a redacted version of Group Exhibit 11 to be filed in the public record.

5. The City does not believe the redacted information in Group Exhibit 11 is necessary for the Court's consideration in regard to its Reply in Support of the Motion to Bar Jon Shane and, accordingly, withdraws its request to file an unredacted version under seal.

6. Undersigned counsel for the City conferred with Plaintiff's counsel regarding the motion, including the City's intent to file a corrected version of the Reply in Support of Defendants' Joint Motion to Bar Jon M. Shane's *Monell* Opinions. Plaintiff's counsel indicated the motion could be presented as unopposed.

WHEREFORE, Defendant, City of Chicago, respectfully moves to withdraw its request for leave to file Group Exhibit 11 under seal as set forth in Dkt. 241.

Date: February 13, 2025

Respectfully submitted,

MARY B. RICHARDSON-LOWRY
Corporation Counsel, City of Chicago

By: /s/ Elizabeth A. Ekl
Special Assistant Corporation Counsel

Terrence M. Burns
Paul A. Michalik
Daniel M. Noland
Daniel J. Burns
Burns Noland LLP
311 South Wacker Drive
Suite 5200
Chicago, IL 60606
(312) 982-0090 (telephone)

Attorneys for Defendant City of Chicago

CERTIFICATE OF SERVICE

I hereby certify that on **February 13, 2025**, I electronically filed the foregoing **Defendant City's Motion to Withdraw Request for Leave to File Exhibit Under Seal (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