

043133/19344/MHW/REN/SLB

**UNITED STATES DISTRICT COURT**  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

JOHNNY JONES,

Plaintiff,

v.

WEXFORD HEALTH SOURCES, INC. and  
DR. MARSHALL JAMES,

Defendants.

Case Number 17 cv 8218

Honorable Mary M. Rowland

**UNOPPOSED MOTION TO FILE EXHIBITS UNDER SEAL**

Defendants, WEXFORD HEALTH SOURCES, INC. and DR. MARSHALL JAMES, by and through one of their attorneys, Sandra L. Byrd of CASSIDAY SCHADE LLP, and for their Unopposed Motion to File Exhibits under Seal, state as follows:

1. Plaintiff brings this action alleging the above named Defendants acted with deliberate indifference to his serious medical needs and/or committed the state law tort of medical malpractice.

2. The issues of this case involve Plaintiff's medical treatment and medical records.

3. Defendants have filed their motion for summary judgment [Dkt. #90] in which they refer to certain medical records in their Local Rule 56.1 Statement of Facts. [Dkt. #91].

4. Keeping with this Court's rules regarding the filing of medical and personal information, Defendant requests leave to file under seal Exhibits I & J of Defendants' Local Rule 56.1 Statement of Facts.

5. Plaintiff does not oppose the relief requested in this Motion.

WHEREFORE, Defendants, WEXFORD HEALTH SOURCES, INC. and DR. MARSHALL JAMES, respectfully request that this Honorable Court grant them leave to file under

seal Exhibits I & J to Defendants' Local Rule 56.1 Statement of Material Facts and for any other relief this Court deems just.

Respectfully submitted,

WEXFORD HEALTH SOURCES, INC. and DR.  
MARSHALL JAMES

By: Sandra L. Byrd

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*Attorneys for Defendants Wexford Health  
Sources, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 6, 2020 I electronically filed the foregoing document with the clerk of the court for Northern District of Illinois, Eastern Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of E-Filing” to the attorneys of record in this case.

/s/ Sandra L. Byrd

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