

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

Leticia Vargas, Administrator of the Estate of Angel Cruz,)	
)	
)	
Plaintiff,)	
)	
v.)	No. 18-cv-1865
)	
County of Cook, Augustus Alabi,)	Judge Steven Seeger
Lorraine Chatman, Helen Kanel,)	
Cherri Krzyzowski, Manuel Manalastas,)	JURY DEMANDED
and Dr. Steve Paschos,)	
)	
Defendants.)	

**DEFENDANTS – NURSE KANEL, NURSE CHATMAN, NURSE MANALASTAS,
NURSE ALABI, AND NURSE KRZYZOWSKI - MOTION TO FILE EXHIBIT C,
EXHIBIT D, EXHIBIT O, and EXHIBIT X UNDER SEAL PURSUANT TO LOCAL
RULE 26.2(c)**

Defendants HELEN KANEL, MANUEL MANALASTAS, AUGUSTUS ALABI, CHERRI KRZYZOWSKI, and LORRAINE CHATMAN , by their attorney KIMBERLY M. FOXX, Cook County State's Attorney, through her Assistant State's Attorney, William R. Ragen, and move this Honorable Court pursuant to Local Rule 26.2(c) to allow Defendants to file Exhibits C, D, O, and X under seal and state in support thereof:

1. Exhibits D and O consist of Mr. Cruz's medical records from Hinsdale Hospital and Cermak Health Services and contain sensitive medical documents that should not be publicly filed pursuant to HIPAA confidentiality concerns and concerns for Illinois' Mental Health and Developmental Disabilities Confidentiality Act.
2. Exhibit C consists of Mr. Cruz's record from the Countryside Police Department and contains sensitive medical documents that should not be publicly filed pursuant to concerns

of disclosure of material concerning for Illinois' Mental Health and Developmental Disabilities Confidentiality Act.

3. Exhibit C contains Mr. Cruz Medical Examiner Report and contains sensitive medical documents that should not be publicly filed pursuant to HIPAA confidentiality concerns.
4. Defendant has filed a provisional filing of the document under seal with only the sealed documents excluded.
5. Defendant now moves this Honorable to grant Defendant' Motion to Exhibits C, D, O, and X under seal.

Therefore, Defendant respectfully requests that this Honorable Court allow grant this Honorable Court to grant Defendant's Motion to Exhibits C, D, O, and X under seal and grant any other relief as seen fit.

Respectfully submitted,

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