

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

In re: WATTS COORDINATED PRETRIAL PROCEEDINGS)))))))	Master Docket Case No. 19-cv-01717 Judge Andrea R. Wood Magistrate Judge Sheila M. Finnegan
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DEFENDANTS' JOINT MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Defendants, through their respective counsel, seek leave to file two documents under seal in connection with their Motion for Leave to Supplement Their Response to Plaintiff's Motion for a Protective Order. In support thereof, Defendants state as follows:

1. Plaintiffs filed a Motion for a Protective Order seeking to limit deposition testimony of Plaintiffs. Defendants jointly filed a response and Plaintiffs filed a reply. Briefing is now complete.
2. Based on Plaintiffs' reply, Defendants are seeking leave of this Court to supplement their brief and to file two pages of documents received in response to document requests to the Federal Bureau of Investigation.
3. These documents are subject to the Agreed Revised Protective Order entered in the *In re: Watts Coordinated Pretrial Proceedings*. Dkt. 84.
4. Defendants believe any argument or reference to the contents of those documents in their motion and brief would also be subject to the conditions set forth in the Agreed Revised Protective Order. *See id.*
5. Pursuant to Local Rule 26.2 (c) and this Court's standing order, Defendants are provisionally filing their motion and brief, as well as these two pages, electronically under seal.

6. Defendants are also electronically filing their motion and brief with any argument or reference that discloses information found in those two pages of FBI documents redacted pursuant to their interpretation of the Agreed Revised Protective Order. *See* L.R. 26.2 (c); Webpage of Magistrate Judge Sheila M. Finnegan, “Protective Order.”. The two pages of FBI documents are excluded in their entirety from Defendants’ filing. *Id.*
7. Defendants respectfully request leave of this Court to file their motion and brief, and the two pages of FBI documents, under seal.

Respectfully Submitted,

/s/ Anthony E. Zecchin

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CERTIFICATE OF SERVICE

I, Anthony E. Zecchin, an attorney, hereby certify that, on July 7, 2020, I electronically filed the foregoing document with the Court's CM/ECF system, which sent electronic notification of the filing on the same day to all counsel of record.

/s/ Anthony E. Zecchin