

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

)
In re: WATTS COORDINATED) Master Docket Case No. 19-cv-01717
PRETRIAL PROCEEDINGS)
) Judge Andrea R. Wood
)
) Magistrate Judge Sheila M. Finnegan
)

Plaintiffs' Motion For Leave To File Under Seal

The Plaintiffs represented by Loevy & Loevy respectfully move for an order permitting them to file under seal their response in opposition to Defendants' Motion to Supplement (Dkt. 145), and to publicly file a redacted version of their response, stating in support as follows:

1. Defendants' Motion to Supplement their Opposition to Plaintiffs' Motion for a Protective Order describes and attaches documents that were produced by the FBI and marked as Confidential subject to the Agreed Revised Privacy Act Order that the Court entered in this case. *See* Dkt. 84.

2. Pursuant to the Agreed Privacy Act Order, Defendants sought leave to file their supplement under seal, and to file a redacted public version of their brief. *See* Dkt. 143.

3. Because Plaintiffs' opposition to Defendants' motion also describes the FBI documents that Defendants cited in their motion, they also seek leave pursuant to Local Rule 26.2 to file their opposition under seal, and to file a redacted public version of the opposition.

WHEREFORE, the Plaintiffs represented by Loevy & Loevy respectfully request that the Court grant their motion for leave to file under seal.

Respectfully submitted,

/s/ Scott Rauscher

Arthur Loevy
Jon Loevy
Scott Rauscher
Joshua A. Tepfer
Theresa Kleinhaus
Loevy & Loevy
311 N. Aberdeen, 3rd Floor
Chicago, IL 60607
(312) 243-5900

Attorneys for the Plaintiffs represented by Loevy & Loevy in the coordinated proceedings