

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

)
In re: Watts Coordinated Pretrial) No. 19-cv-1717
Proceedings) (Judge Valderrama)
)
) (Magistrate Judge Finnegan)

PLAINTIFFS' MOTION TO FILE UNDER SEAL

Plaintiffs, by counsel and pursuant to Local Rule 26.2, respectfully seek leave to file under seal the unredacted version of their Motion to Supplement Status Report Regarding in Camera Review of FBI Recordings.

Grounds for this motion are as follows:

1. Plaintiffs' Motion to Supplement Status Report Regarding in Camera Review of FBI Recordings involves material that must be filed under seal because it is covered by the Privacy Act Order. ECF No. 29.

2. Pursuant to Local Rule 26.2, plaintiff has provisionally filed the Motion under seal and has filed a public-record version with redactions.

ACCORDINGLY, plaintiffs respectfully request that the Court grant leave to file under seal the unredacted version of their Motion to Supplement Status Report Regarding in Camera Review of FBI Recordings.

Respectfully submitted,

[Signature on next page]

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
KENNETH N. FLAXMAN P.C.
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200
jaf@kenlaw.com
Attorneys for the Plaintiffs Represented by Kenneth N. Flaxman P.C.

Jon Loevy
Arthur Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Gianna Gizzi
LOEVY & LOEVY
311 North Aberdeen Street,
Chicago, IL 60607
(312) 243-5900
Attorneys for Plaintiffs Represented by Loevy & Loevy