

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

	)	Master Docket Case No. 19-CV-01717
	)	
In re: WATTS COORDINATED	)	Judge Valderrama
PRETRIAL PROCEEDINGS	)	
	)	Magistrate Judge Finnegan
	)	

THIS DOCUMENT RELATES TO  
*In re: Watts Coordinated Pretrial Proceedings*, Case No. 19-CV-01717

**MOTION FOR LEAVE TO FILE PORTIONS OF  
CERTAIN DEFENDANTS’ MOTION TO DEPOSE  
FBI AGENTS REGARDING ALLEGATIONS OF AGENT MISCONDUCT  
PROFFERED BY PLAINTIFFS’ DISCLOSED WITNESSES UNDER SEAL**

NOW COME certain Defendants, through their respective attorneys at Hale & Monico, LLC, Leinenweber, Baroni & Daffada, LLC, Borkan & Scahill, Ltd., and Reiter Burns LLP (“Defendants”), and pursuant to Local Rule 26.2 move for this Court to allow Defendants leave to file portions of their Motion to Depose FBI Agents Regarding Allegations of Agent Misconduct Proffered by Plaintiffs’ Disclosed Witnesses (“Defendants’ Motion”) under seal. In support thereof, Defendants state as follows:

1. A Confidentiality Order, Agreed Privacy Act Order, and Amended Confidentiality Order have been entered in these *Coordinated Pretrial Proceedings*. Dkt. 3, 29, 57.
2. Defendants’ Motion cites, refers to, and attaches documents and materials that have been designated as “Confidential” and/or subject to the aforementioned confidentiality and Privacy Act orders, including Exhibits A, B, E, F, I, and K.
3. Pursuant to Local Rule 26.2, Defendants will file a public version of Defendants’ Motion with redactions and without Exhibits A, B, E, F, I, and K and will provisionally file an unredacted copy of Defendants’ Motion, in addition to Exhibits A, B, E, F, I, and K, under seal.

WHEREFORE, Defendants' respectfully request this Court grant this Motion and file an unredacted copy of Defendants' Motion to Depose FBI Agents Regarding Allegations of Agent Misconduct Proffered by Plaintiffs' Disclosed Witnesses and Exhibits A, B, E, F, I, and K to said Motion, under seal.

Respectfully submitted,

By: /s/ Daniel M. Noland

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**CERTIFICATE OF SERVICE**

I, Kelly M. Olivier, an attorney, hereby certify that February 16, 2024, I caused to be filed with the Clerk of the Court's *CM/ECF* system a copy of the MOTION FOR LEAVE TO FILE PORTIONS OF CERTAIN DEFENDANTS' MOTION TO DEPOSE FBI AGENTS REGARDING ALLEGATIONS OF AGENT MISCONDUCT PROFERRED BY PLAINTIFFS' DISCLOSED WITNESSES UNDER SEAL which simultaneously served copies on all counsel of record via electronic notification.

/s/ Kelly M. Olivier