

**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 Franklin U. Valderrama  
)  
) Magistrate Judge Sheila M. Finnegan  
)

THIS DOCUMENT RELATES TO CASE NO. 16-CV-8940

**PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE INSTANTER  
THEIR DAUBERT MOTION AND RELATED EXHIBITS UNDER SEAL**

Plaintiffs respectfully request leave to file their Motion to Bar or Limit Certain  
Testimony of Defendants' Expert Witness Michael Brown and a related exhibits under seal  
("Brown Motion") pursuant to Local Rule 26.2, stating in support as follows:

1. In Plaintiffs' Brown Motion, they reference information that was derived from the  
FBI investigation of Watts and Mohammed.
2. Moreover, the exhibits for the Brown Motion contain confidential information  
stemming from the FBI's investigation.
3. When the FBI produced the relevant investigation records in this litigation, the  
records were marked as Confidential under the Privacy Act Order in this case. *See* Dkts. 3 & 84  
in Case No. 19-cv-1717.
4. Plaintiffs seek leave to file their Brown Motion and the related exhibits under seal  
to comply with the Confidentiality Order and Privacy Act Order. Dkts. 3 & 84 in Case No. 19-  
cv-1717.

5. Pursuant to Local Rule 26.2, Plaintiffs will file a public version of their Motion with redactions of the confidential information and will provisionally file the Motion and exhibits electronically under seal.<sup>1</sup>

6. Because Mr. Brown is an expert for the City, Plaintiffs' counsel conferred with counsel for Defendant City, and they indicated that they do not oppose this motion.

7. For the foregoing reasons, Plaintiffs respectfully move this Honorable Court to grant their motion for leave to file their Motion to Bar or Limit Certain Testimony of Defendants' Expert Witness Michael Brown and a related exhibits under seal.

Respectfully submitted,

/s/ Gianna Gizzi  
*One of the attorneys for the Plaintiffs*

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<sup>1</sup> Because these exhibits involve the FBI investigation of Watts and Mohammed and address confidential matters, Plaintiffs erred on the side of caution in filing them under seal in their entirety. However, if this Court prefers Plaintiffs to file redacted versions of the exhibits on the public docket, they will do so.