

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

|                               |   |                                           |
|-------------------------------|---|-------------------------------------------|
| BEN BAKER AND CLARISSA GLENN, | ) |                                           |
|                               | ) | Case No. 16 CV 8940                       |
| <i>Plaintiffs,</i>            | ) |                                           |
|                               | ) |                                           |
| -vs-                          | ) | Judge Franklin U. Valderrama              |
|                               | ) |                                           |
| CITY OF CHICAGO, ET AL.,      | ) | Magistrate Judge Shelia M. Finnegan       |
|                               | ) |                                           |
| <i>Defendants.</i>            | ) |                                           |
|                               | ) | (This case is part of <i>In re: Watts</i> |
|                               | ) | <i>Coordinated Pretrial Proceedings,</i>  |
|                               | ) | Master Docket No. 19-cv-1717)             |
|                               | ) |                                           |

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL**

Defendants Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel Leano, Brian Bolton, Kenneth Young, Jr., Elsworth Smith, Jr., Kallatt Mohammed, and Ronald Watts, (collectively “Defendants”), by and through their undersigned counsel, pursuant to Local Rule 26.2, hereby move the Court for leave to file under seal Defendant Officers’ Motion to Bar Certain Opinion of Plaintiffs’ Proposed Expert Jon M. Shane pursuant to *Daubert v. Merrell Dow Pharms., Inc.*, 509 U.S. 579 (1993).:

1. Plaintiffs disclosed Dr. Shane as a retained expert to testify, in part, about certain wrongful conduct by officers engaged in narcotics enforcement and standards related to documentation of certain arrests. A significant part of Dr. Shane’s report and his deposition, Exhibits A and D, respectively, pertain to matters that are subject to the Confidentiality Order that was entered in these cases. Dkt. no. 3.

2. Defendants therefore request leave to file the full version of their motion to bar and

exhibits under seal. Plaintiffs do not oppose the motion.

3. Pursuant to the applicable Local Rules, Defendants will file their motion and exhibits provisionally under seal and will file a redacted version of Exhibits A and D on the public docket if leave is granted.

WHEREFORE, Defendants request that this Court enter an order granting them leave to file their motion to bar Dr. Shane as a witness under seal, and for such other relief as the Court deems necessary.

Dated: June 10, 2024

Respectfully submitted,

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Attorney for Defendant Ronald Watts  
Special Assistant Corporation Counsel

By: /s/ Anthony E. Zecchin  
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**CERTIFICATE OF SERVICE**

I, Anthony E. Zecchin, an attorney, hereby certify that, on **June 10, 2024**, I electronically filed the forgoing, DEFENDANT OFFICERS' UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL with the Clerk of the Court using the ECF system, which simultaneously served copies on all counsel of record via electronic notification.

/s/ Anthony E. Zecchin