

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

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) Master Docket Case No. 19-cv-01717
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) Judge Franklin U. Valderrama
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) Magistrate Judge Sheila M. Finnegan
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)
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**CERTAIN DEFENDANTS' MOTION FOR LEAVE TO FILE CERTAIN
DEFENDANTS' MOTION TO COMPEL AND EXHIBITS UNDER SEAL**

Defendants, City of Chicago, Philip Cline, Debra Kirby, Karen Rowan, Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel S. Leano, Brian Bolton, Kenneth Young, Jr., David Soltis, Elsworth J. Smith, Jr., Gerome Summers, Jr., John Rodriguez, Lamonica Lewis, Frankie Lane, Katherine Moses-Hughes, Darryl Edwards, Nobel Williams, Calvin Ridgell, Jr., Michael Spaargaren, and Matthew Cadman for their Motion for Leave to File Certain Defendants' Motion to Compel and Exhibits Under Seal, states:

1. A Confidentiality Order, Agreed Privacy Act Order, and Amended Confidentiality Order have been entered in the *Coordinated Pretrial Proceedings*, Dkts. 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-E.
3. Pursuant to Local Rule 26.2, Defendants will file a public version of Defendants' Motion with redactions and without Exhibits A-E, and will provisionally file an unredacted copy of Defendants' Motion, in addition to Exhibits A-E, under seal.

WHEREFORE, Defendants City of Chicago, Philip Cline, Debra Kirby, Karen Rowan, Alvin Jones, Robert Gonzalez, Miguel Cabrales, Douglas Nichols, Jr., Manuel S. Leano, Brian Bolton, Kenneth Young, Jr., David Soltis, Elsworth J. Smith, Jr., Gerome Summers, Jr., John Rodriguez, Lamonica Lewis, Frankie Lane, Katherine Moses-Hughes, Darryl Edwards, Nobel Williams, Calvin Ridgell, Jr., Michael Spaargaren, and Matthew Cadman respectfully request this Court grant Moving Defendants' leave to file an unredacted copy of Certain Defendants' Motion to Compel and Exhibits under seal.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on **October 4, 2024**, I electronically filed the foregoing **Certain Defendants' Motion for Leave to File Under Seal** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to counsel of record.

s/ Dhaviella N. Harris
