

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

**PLAINTIFFS' MOTION TO FILE SUPPLEMENT
IN FURTHER SUPPORT OF MOTION TO COMPEL**

Plaintiffs, by counsel, respectfully seek leave to file the following as a supplement to their pending motion to compel.

Grounds for this motion are as follows:

1. Plaintiffs' pending motion to compel seeks discovery of a "task file," a set of internal documents maintained by the Chicago Police Department about the change to a police policy. (ECF No. 67.)
2. Defendant contends that disclosure of task file materials would "have a chilling effect on the ability of CPD personnel to engage in free, open, collaborative discussions." (ECF No. 69 at 4.)
3. Plaintiffs' counsel recently received, in response to a request under the Illinois Freedom of Information Act, the Police Department's task file for a recent modification of Special Order S02-01-01. (Special Order S02-

01-01 concerns police interactions with people with disabilities; it is not related to plaintiffs' claims in this case.)

4. Plaintiffs attach the task file for Special Order S02-01-01, which includes internal communications and drafts, as Exhibit 1.

5. The Police Department's production of this task file in response to a request under the Illinois Freedom of Information Act is difficult to square with defendant's claim of a chilling effect from the release of separate task file materials in this matter.

ACCORDINGLY, plaintiffs respectfully request that the Court permit the filing of this supplement and grant the motion to compel.

Respectfully submitted,

/s/ Joel A. Flaxman
Joel A. Flaxman
ARDC No. 6292818
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
jaf@kenlaw.com
Attorneys for Plaintiff