

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

VONDELL WILBOURN, individually  
and for others similarly situated,

*Plaintiff,*

-VS-

SHERIFF OF COOK COUNTY and  
COOK COUNTY, ILLINOIS,

*Defendants.*

Case No. 23-cv-1782

Honorable Manish S. Shah  
Magistrate Judge Young B. Kim

**AGREED MOTION FOR ENTRY OF HIPAA QUALIFIED PROTECTIVE ORDER**

Defendants, THOMAS DART, in his official capacity as Sheriff of Cook County, and COOK COUNTY, ILLINOIS, by their attorney KIMBERLY M. FOXX, State's Attorney of Cook County, through her Special Assistant State's Attorneys, JOHNSON & BELL, LTD., respectfully request that this Honorable Court enter an Agreed HIPAA Qualified Protective Order. In support thereof, Defendants state as follows:

1. Plaintiff, Vondell Wilbourn, filed the above-captioned matter against Defendants pursuant to 42 U.S.C. § 1983, alleging he was arrested solely for claimed deviations from the conditions of electronic monitoring and without a warrant or other court order. (Am. Compl. ¶¶ 19, 29, ECF No. 19.) Plaintiff alleges that Defendant Sheriff of Cook County violated his rights secured by the Fourth and Fourteenth Amendments of the Constitution of the United States of America. (*Id.* ¶¶ 4, 15–17.)

2. In response to one of Defendants' interrogatories, Plaintiff stated that he told a nurse at Cermak hospital that he had been pushed down the stairs.

3. Plaintiff agrees that he does not have a claim in this case involving the stairs outside of his residence, and he is not seeking damages for any physical injury.

4. Nevertheless, Plaintiff's medical records may contain statements relevant to the case.

2. The parties have discussed a HIPAA Qualified Protective Order and have agreed upon its language. The proposed order will be submitted to: [Proposed\\_Order\\_Shah@ilnd.uscourts.gov](mailto:Proposed_Order_Shah@ilnd.uscourts.gov).

WHEREFORE, the Parties respectfully request that this Honorable Court enter the proposed Agreed HIPAA Qualified Protective Order to govern all disclosures where appropriate.

Respectfully submitted,

KIMBERLY M. FOXX  
State's Attorney of Cook County

Dated: September 5, 2024

/s/ Samuel D. Branum  
Special Assistant State's Attorney

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