

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

MADELINE MENDOZA,

Plaintiff,

v.

REYNALDO GUEVARA, et al.,

Defendants.

Case No. 23-cv-2441

---

MARILYN MULERO,

Plaintiff,

v.

REYNALDO GUEVARA, et al.,

Defendants.

Case No. 23-cv-4795

**DEFENDANTS' JOINT MOTION FOR LEAVE TO FILE EXHIBITS 3, 6 AND 7 IN  
SUPPORT OF THEIR JOINT RESPONSE TO THE COOK COUNTY STATE'S  
ATTORNEYS'S OFFICE'S MOTION FOR PROTECTIVE ORDER UNDER SEAL**

NOW COME Defendants Reynaldo Guevara, Geri Lynn Yanow, as Special Representative for Ernest Halvorsen, deceased, Anthony Riccio, Stephen Gawrys, and the City of Chicago (collectively "Defendants"), by and through their undersigned counsel for their Motion to file Exhibits 3, 6 and 7 in Support of Their Joint Response to the Cook County State's Attorneys's Office's Motion for Protective Order under Seal, state as follows:

1. Exhibits 3, 6 and 7 to Defendants' Response to the Cook County State's Attorneys's Office's Motion for Protective Order have been designated as confidential, subject to protective order.

2. To maintain the confidentiality designation, Defendants are redacting the confidential information and will produce, under seal, the unredacted versions of those exhibits.

WHEREFORE, for the foregoing reasons, Defendant Officers respectfully requests this Court grant their Motion for Leave to File Exhibits 3, 6 and 7 in Support of Their Joint Response to the Cook County State's Attorneys's Office's Motion for Protective Order, and for any other relief as this Court deems just and reasonable.

Respectfully submitted,

By: /s/ Timothy P. Scahill

Special Assistant Corporation Counsel

Steven B. Borkan  
Timothy P. Scahill  
Andrea F. Checkai  
Whitney N. Hutchinson  
BORKAN & SCAHILL, LTD.  
20 South Clark Street, Suite 1700  
Chicago, Illinois 60603  
*Counsel for Reynaldo Guevara*

/s/ Josh M. Engquist  
Josh M. Engquist

Special Assistant Corporation Counsel

Josh M. Engquist  
Caroline P. Golden  
David A. Brueggen  
Jeffrey R. Kivetz  
Kyle T. Christie  
Allison L. Romelfanger  
Special Assistant Corporation Counsel  
THE SOTOS LAW FIRM, P.C.  
141 W. Jackson, Suite 1240A  
Chicago, Illinois 60604  
*Counsel for Individual Defendants*

/s/ Eileen E. Rosen

Special Assistant Corporation Counsel

Eileen E. Rosen

Catherine M. Barber

Lauren Ferrise

Rock, Fusco, & Connelly

333 W. Wacker, 19th Floor

Chicago, Illinois 60606

*Counsel for Defendant City of Chicago*