

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

JEROME FEARS,)	
)	
Plaintiff,)	No. 24-CV-05101
)	
v.)	Judge Matthew F. Kennelly
)	
CITY OF CHICAGO, and CHICAGO)	
POLICE OFFICER ELIAS AGREDANO,)	
)	
Defendants.)	

**DEFENDANTS' AGREED MOTION FOR ENTRY OF CONFIDENTIALITY
PROTECTIVE ORDER**

Defendants, CITY OF CHICAGO and ELIAS AGREDANO by and through their attorneys, JOHNSON & BELL, LTD., respectfully request that this Honorable Court enter a Confidentiality Order to govern all disclosures where appropriate. In support thereof, Defendants state as follows:

1. Plaintiff, Jerome Fears, filed a complaint, pursuant to 42 U.S.C. § 1983, alleging that Defendant Agredano deprived him of liberty in violation of his Constitutional rights under the Fourth Amendment when he was arrested and charged with Reckless Conduct, Resisting/Obstructing a Police Officer, and Soliciting Unlawful Business on July 11, 2023. [Dkt. 1]. Plaintiff's Complaint also alleges a supplemental state law claim against Defendant City of Chicago for the tort of battery in connection with the arrest of Jerome Fears on July 11, 2023. [Dkt. 1].

2. Plaintiff and the Defendants have engaged in the exchange of discovery and anticipate the disclosure of certain Confidential Information as defined in paragraph 2 of the attached proposed Agreed Confidentiality Order. (Ex. A).

3. The parties conferred pursuant to Fed. R. Civ. P. 26(c) and agree that entry of the attached proposed Agreed Confidentiality Order (Ex. A) is appropriate in this case.

4. The parties utilized the Northern District of Illinois model order to the extent possible. The Parties attach hereto a redlined version of their proposed Agreed Confidentiality Order (Exhibit B), which reflects any changes/additions to the model order.

WHEREFORE, Defendants CITY OF CHICAGO and ELIAS AGREDANO respectfully request that this Honorable Court enter the attached Confidentiality Order to govern all disclosures where appropriate.

Respectfully submitted,

JOHNSON & BELL, LTD.

By: /s/Jack A. Gainer
Attorney for the Defendants

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CERTIFICATE OF SERVICE

I, Lisa McElroy, hereby certify that, in accordance with Fed. R. Civ. P. 5 and LR 5.5 and the General Order on Electronic Case Filing (ECF), I served this Notice, together with the documents herein referred, electronically via the ECF-CM system to all counsel of record on **January 14, 2025.**

/s/ Jack A. Gainer

Jack A. Gainer