

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

ERIC WILKINS, MAHARI BELL,)	
ESSENCE JEFFERSON, JOSE)	
MANUEL ALMANZA, JR., AND)	
JACQUEZ BEASLEY,)	
)	
)	Case No. 23-cv-4072
Plaintiffs,)	
)	Hon. Mary M. Rowland
v.)	
)	
CITY OF CHICAGO,)	
)	
Defendant.)	
)	

NOTICE OF FILING

Pursuant to the Court’s Order on Plaintiffs’ motion for a ruling on the City’s confidentiality designations (Dkt. 187), Plaintiffs Eric Wilkins, Mahari Bell, Essence Jefferson, José Manuel Almanza, Jr., and Jacquez Beasley (collectively, “Plaintiffs”), re-file their Motion for Class Certification, Memorandum in Support of Motion for Class Certification, and supporting Declarations and Exhibits (Dkts. 154 and 155), originally filed August 11, 2025, with the following changes:

1. Forty-eight exhibits to the Declaration of Chris Burbank (Exhibit B), which were filed provisionally under seal, are now re-filed unsealed. *See* Dkt. 187 at 3 and 10; Dkt. 171, Table 2: Undisputed Documents City Withdraws Confidentiality Designations. These exhibits are: Exs. 4, 10, 11, 12, 15, 22, 26, 29, 31, 33, 34, 40, 42, 46-c, 46-d, 46-j, 46-k, 46-p, 46-x, 46-y, 46-z, 46-bb, 46-dd, 46-ff, 46-gg, 46-hh, 46-jj, 46-kk, 46-ll, 47, 48, 49, 50, 52, 55, 56, 57, 60, 62, 63, 64, 66, 70, 71, 72, 73, and 75 to Exhibit B.

2. Due to the unsealing of the forty-eight exhibits listed above, upon re-filing, Plaintiffs have removed redactions from sections that refer to those exhibits in their Memorandum in Support of Motion for Class Certification, Declaration of Chris Burbank (Exhibit B), and Burbank Ex. 46 – Appendix of CompStat Exemplar Documents.

3. In accordance with the Court’s Order of August 12, 2025, granting leave to file the original Motion for Class Certification documents under provisional seal (Dkt. 160), Plaintiffs re-file under seal thirty-three exhibits that the City designated as Confidential or Attorneys’ Eyes Only, and preserve the corresponding redactions in the Memorandum, Declaration of Chris Burbank, and Appendix of CompStat Exemplar Documents.

4. This re-filing does not change the briefing schedule previously entered by the Court (Dkt. 168), under which the City’s response to Plaintiffs’ Motion for Class Certification is due by January 30, 2026, and Plaintiffs’ Reply is due by February 27, 2026.

Dated: December 1, 2025

Respectfully Submitted,

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