

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

Keith Rogers, James Hill, and Wanda)	
Hollins, individually and for a class)	
)	
<i>Plaintiffs,</i>)	
)	<i>(Judge Chang)</i>
<i>-vs-</i>)	
)	15-cv-11632
Sheriff of Cook County and Cook)	
County, Illinois)	
)	
<i>Defendants</i>)	

DISCOVERY SCHEDULING REPORT

Pursuant to the Court's order of January 14, 2014 (ECF No. 180), the parties submit this discovery scheduling report:

I. Class Notice

1. The Sheriff will provide identifying information for mailing of notice to class members by March 3, 2021.
2. Plaintiffs will mail class notice by March 31, 2021 to the last known address of class members as provided by the Sheriff.
3. The parties suggest that the Court set May 5, 2021 (35 days after mailing of notice) for class members to opt-out.

II. Fact Discovery

1. Plaintiffs may identify not more than ten class member as potential exemplars on or before August 6, 2021. (Plaintiffs' counsel will use

this 90 day period to interview class members and secure corroborating records.)

2. Defendants may propound written discovery and complete depositions of class member and potential exemplars on or before November 3, 2021. (The parties agree that any class member who is a potential trial witness should respond to interrogatories and submit to a deposition.)

3. Plaintiffs may seek initiate additional discovery to obtain information about the impact of the 2019 change in policies and practices concerning opioid agonists. Defendants object to the extent Plaintiff seeks additional discovery regarding the effect of any policies, practices, or events that occurred after the Court-ordered class closure date of October 7, 2019. Plaintiff asserts that such discovery would be relevant to the feasibility of earlier adoption of the present policy. *Abernathy v. E. Illinois R.R. Co.*, 940 F.3d 982, 993 (7th Cir. 2019)

4. All fact discover shall be completed by November 30, 2021.

III. Expert Discovery

1. Plaintiffs will serve their Rule 26 expert disclosures by December 31, 2021.

2. Defendants may serve their Rule 26 expert disclosures by March 4, 2022.

3. Plaintiffs may serve any Rule 26 rebuttal reports by April 27, 2022.

IV. Dispositive Motions

The Court will set a schedule for dispositive motions at a status hearing to be held after the completion of fact discovery.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Joel A. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave Ste 201
Chicago, IL 60604-2430
(312) 427-3200
Attorneys for Plaintiff

/s/ Gerald M. Dombrowski
(with consent)
Gerald M. Dombrowski
Sanchez Daniels & Hoffman LLP
333 W Wacker Dr, Ste 500
Chicago, IL 60606
Attorneys for Defendant Sheriff

/s/ Lyle K. Henretty (with consent)
Assistant State's Attorney
2760 Daley Center
Chicago, IL 60602
Attorneys for Defendant
Cook County