

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, )  
  )  
  )  
Plaintiffs, )  
  )  
  )  
-vs- )  
  )  
  )  
Sheriff of Cook County and Cook )  
County, Illinois, )  
  )  
  )  
Defendants. )

(*Judge Chang*)

15-cv-11632

**JOINT STATUS REPORT**

The parties submit the following joint status report:

1. Plaintiffs have identified eleven potential exemplars.<sup>1</sup> Based on experience in other cases, plaintiffs' undersigned counsel believes that the number of exemplars who will follow through and answer interrogatories and submit to a deposition will be fewer than the authorized ten exemplars.
2. Defendants are in the process of gathering the Jail records of the putative exemplars and expect to serve interrogatories by September 1, 2021 and depose the putative exemplars by November 3, 2021, in compliance with this Court's scheduling order.

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<sup>1</sup> Plaintiffs' counsel disclosed the exemplars one business day late (on Monday, August 9, 2021, rather than Friday, August 6, 2021). Plaintiffs' undersigned counsel request the Court excuse the late filing, which was necessitated by counsel's inability to return to a normal schedule following his jet-lagged return from a family vacation. Defendants do not object to the late disclosure.

3. Counsel have conferred about supplemental class notice as directed by the Court. (ECF No. 188.) Plaintiffs' counsel has identified about 50 class members who did not receive class notice but who provided a current address to receive their share of the settlement in *Parish v. Sheriff*, 07-cv-2427. Plaintiffs' counsel will search public records maintained by the Illinois Department of Corrections to identify class members who are currently confined in the penitentiary. Counsel proposes to report on those efforts and propose dates for supplemental notice in the next status report.

4. The parties remain on schedule to meet the dates set in the Court's order of February 1, 2022 (ECF No. 184.)

Respectfully submitted,

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