

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

AGREED MOTION TO RESET DISCOVERY SCHEDULE

Plaintiffs, with the agreement of defendants, request the Court to reset the discovery schedule to allow for the completion of fact discovery by January 31, 2022 (rather than the current date of November 30, 2021).

Grounds for this motion are as follows:

1. Plaintiffs identified eleven exemplars on August 9, 2021. Defendants propounded interrogatories to each exemplar on September 1, 2021. (The parties agree that written discovery to the exemplars is appropriate in this class action.)

2. Defendants produced the Jail medical records of each exemplar on September 24, 2021.

3. The medical records consist of 9075 pages. Class counsel expects to complete a review of these records by November 19, 2021, and

to then be able to respond to the interrogatories on a rolling basis.

Defendants agree that this is a reasonable schedule.

4. Defendants also agree that extending the completion of fact discovery to January 31, 2022 will allow the parties a reasonable opportunity to complete depositions of the exemplars.

Respectfully submitted,

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