

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. Class counsel has reviewed the voluminous medical records of eleven potential exemplars and expects to conduct phone interviews of the exemplars starting on December 15, 2021. This schedule will allow interrogatory answers to be served during the week of January 3, 2022.
2. Defendants will seek to complete Zoom depositions of the exemplars by January 31, 2022.
3. Plaintiffs have identified from the medical records several (not more than four) medical providers employed at the Cook County Jail whose depositions are likely to produce relevant information. Class counsel predicts that these depositions can be completed by February 28, 2022. Defendants do not take a position on this prediction.

4. Class counsel has been unable to provide supplemental class notice because of the burden of while reviewing the medical records of the exemplars and will return to this task after interviewing the exemplars and preparing interrogatory answers. Counsel will propose dates for supplemental notice in the next status report.

5. Counsel for all parties suggest that they file a written status report in January of 2022 to provide information needed for the Court to set a realistic date for completion of expert discovery.

Respectfully submitted,

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