

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>)	

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,

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

/s/ Meghan D. White (with consent)
Meghan D. White
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