

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> |) | |

SUPPLEMENT TO JOINT STATUS REPORT

The parties submit the following supplement to the joint status report filed on May 13, 2022 (ECF No. 200):

1. Plaintiffs made expert disclosure on May 15, 2022 from retained expert Adeyemi Fatoki, MD, MPH.
2. Dr. Fatoki provides opinions about the Cermak Health Services policy at issue in this case and offers the following opinions:
 - a. Opioid use disorder is best treated by a stable maintenance dose of methadone (or other similar medications), or by tapering medication over time with the goal of taking the patient off medication entirely. Continuing or tapering medication is a decision that needs to be made by the patient and provider.
 - b. Detainees with opioid use disorder suffer from a chronic medical condition that requires ongoing medical treatment.
 - c. Tapering results in painful and difficult symptoms, such as “anxiety, chills, muscle pain (myalgia) and weakness, tremor,

lethargy, and drowsiness, restlessness and irritability, nausea and vomiting and diarrhea.”

- d. Tapering is likely to cause a high rate of relapse.
- e. Medication maintenance is the standard of care for opioid use disorder, especially for patients whose brain chemistry may have been permanently altered by prolonged opioid use.

3. Given the timing of Dr. Fatoki’s disclosure and the other discovery issues addressed in the May 13, 2022 Joint Status, Defendants reiterate their request (which is not opposed by plaintiffs) for an additional 30 days (to and including July 23, 2022) to make their expert disclosures, with similar adjustments to the other disclosure deadlines.

Respectfully submitted,

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