

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 on discovery progress:

1. Defendant made expert disclosures on August 5, 2022 from Stamatia Z. Richardson, MD.
2. Dr. Richardson offers the following opinions:
 - a. Throughout the class period the OTP (opioid treatment program) policies and procedures complied with all state and federal guidelines, including those promulgated by SAMHSA, NCCHC, IDHS, and the DEA.
 - b. Throughout the class period it was both medically appropriate and humane to taper opioid treatment medication for OUD (opioid use disorder) patients incarcerated in the Cook County Jail. Tapering was significantly safer than the immediate forced withdrawal that would occur if a patient was transferred out of the Jail to a facility that did not provide medication for OUD, or if the patient was released and unable to continue their medication in the community.

- c. During the class period it was not the standard of care that opioid treatment programs inside of correctional facilities required OUD patients to receive methadone maintenance treatment throughout their incarceration.
- d. The OTP's policy to verify the amount and timing of the most recent dose of methadone for each patient prior to dispensing additional methadone is required by the federal standards set forth by the NCHC.
- e. Plaintiff Rogers' methadone taper was medically appropriate, and he received appropriate care for any withdrawal symptoms he experienced at Cook County Jail.
- f. The withdrawal symptoms Plaintiff Hill described during his deposition prior to December 25, 2013 were not caused by methadone withdrawal. Plaintiff Hill's methadone taper was medically appropriate, and he received appropriate care for any withdrawal symptoms he experienced at Cook County Jail after December 25, 2013.
- g. The withdrawal symptoms Plaintiff Hollins described during her deposition prior to September 13, 2013 were not caused by methadone withdrawal. Plaintiff Hollins' methadone taper was medically appropriate, and she received appropriate care for any withdrawal symptoms she experienced at Cook County Jail after December 25, 2013.

3. The parties are on track for plaintiff to serve rebuttal reports by September 6, 2022 and for all expert depositions to be completed by October 14, 2022.

Respectfully submitted,
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