

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

Keith Rogers, <i>et al.</i> ,	)	
	)	
<i>Plaintiffs,</i>	)	
	)	Judge Edmond Chang
<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 in accordance with the Court's orders of March 30, 2024 (ECF No. 243) and April 16, 2024 (ECF No. 250):

1. Plaintiffs served a written settlement demand on April 10, 2024. Plaintiffs' proposed resolution was based on the definition of the class prior to the Court's order of March 30, 2024.
2. Defendants responded on April 11, 2024, requesting additional information and calculations based on the recent redefinition of the class.
3. Plaintiffs provided the additional information on April 11, 2024 and provided an updated settlement demand based on the new class definition on April 17, 2024.
4. Settlement discussions are currently at an impasse.
5. Defendants have declined to respond to Plaintiffs' demand because Plaintiffs did not make a demand for attorney fees and costs and Defendants would prefer a global settlement number.

6. Plaintiffs' position is that there is an ethical problem in negotiating attorney fees at the same time as negotiating relief for the class. Plaintiffs' counsel has successfully resolved several class action cases with these Defendants through negotiations that bifurcated discussions of relief for the class and discussions of attorney fees. Defendants object to Plaintiffs' reference to other class actions because they have no bearing on the settlement issues in this case.

7. Plaintiffs request that the Court direct Defendants to respond to the outstanding settlement demand. Defendants object that they should be forced to respond to Plaintiffs' settlement demand when there are still uncertainties as to the number.

8. After the Court rules on Plaintiffs' motion to reconsider, Defendants intend on requesting a briefing schedule from the Court for their motion for summary judgment.

Respectfully submitted,

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