

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

LIONETTA WHITE, as special  
administrator for the ESTATE OF  
LIONEL WHITE SR.,

Plaintiff

No. 17-cv-2877

v.

CITY OF CHICAGO, ET AL.,

Defendants.

Honorable Sara Ellis

**JOINT MOTION TO EXTEND DEADLINE TO FILE  
MOTIONS TO BAR CERTAIN EXPERTS**

The parties, by counsel, submit this joint motion to extend the deadline to file *Daubert* motions for some of the proposed experts disclosed in this case, stating in support as follows.

1. Under the current schedule in this case, motions for summary judgment and *Daubert* motions are due on February 14, 2025. Dkt. 196.
2. The parties are currently working through the process of attempting to create agreed statements of fact pursuant to this Court's standing order regarding motions for summary judgment. Based on that process to date, as well as based on summary judgment briefed filed in other cases that were part of the *In re: Watts Coordinated Pretrial Proceedings*, 19 CV 1717 ("Coordinated Proceedings"), the parties expect that reports and deposition testimony of four experts may be cited in the summary judgment briefing. Those experts are: Jon Shane and Jeffrey Danik (Plaintiff's experts), and Jeffrey Noble and Mike Brown (Defendants' experts).
3. The parties do not expect that their summary judgment materials will cite to the reports or testimony of anyone else disclosed as an expert in this case.

4. The parties respectfully request that the Court extend the deadline for filing *Daubert* reports for experts other than Shane, Danik, Noble, and Brown. The parties propose that they file any remaining *Daubert* motions with their motions *in limine*. This will allow the parties to continue to dedicate as much of their time as possible to comply with the Court's standing order regarding summary judgment, and it may reduce or alleviate the need for future *Daubert* motions with respect to the other experts if the parties can file those closer to the trial date.

WHEREFORE, the parties request that the Court extend the date for filing *Daubert* motions for experts other than Shane, Danik, Noble, and Brown.

Respectfully Submitted,

/s/ Scott Rauscher  
One of the Attorneys for Plaintiff

Arthur Loevy  
Jon Loevy  
Scott Rauscher  
Josh Tepfer  
Theresa Kleinhaus  
Sean Starr  
Wallace Hilke  
Gianna Gizzi  
LOEVTY & LOEVTY  
311 N. Aberdeen St., Third Floor  
Chicago, IL 60607  
p. (312) 243-5900  
e. [gizzi@loevy.com](mailto:gizzi@loevy.com)

Joel A. Flaxman  
Kenneth N. Flaxman  
LAW OFFICES OF KENNETH N. FLAXMAN P.C.  
200 S Michigan Ave, Ste 201  
Chicago, IL 60604  
p. (312) 427-3200

/s/ Paul Michalik  
One of the Attorneys for Defendants City of Chicago, Philip Cline, and Debra Kirby

Terrence M. Burns  
Paul A. Michalik  
Daniel M. Noland  
Dhaviella N. Harris  
Daniel J. Burns  
BURNS NOLAND LLP  
311 S. Wacker Dr., Suite 5200  
Chicago, IL 60606  
p. (312) 982-0090  
e. [pmichalik@burnsnoland.com](mailto:pmichalik@burnsnoland.com)

/s/Eric Palles  
*One of the Attorneys for Defendant Kallatt Mohammed*

Eric S. Palles  
Sean Sullivan  
Lisa Altukhova  
MOHAN GROBLE SCOLARO, PC  
55 West Monroe, Suite 1600  
Chicago, IL 60603  
p. (312) 422-9999  
e. [epalles@mohangroble.com](mailto:epalles@mohangroble.com)

/s/Brian Gainer  
*One of the Attorneys for Defendant Ronald Watts*

Brian Gainer  
Monica Burkoth  
Lisa M. McElroy  
JOHNSON & BELL LTD.  
33 West Monroe Street, Suite 2700  
Chicago, IL 60603-5404  
p. (312) 372-0770  
e. [gainerb@jbltd.com](mailto:gainerb@jbltd.com)

/s/Jason Marx  
*One of the Attorneys for Defendant Officers*

Andrew M. Hale  
Anthony E. Zecchin  
Kelly M. Olivier  
William E. Bazarek  
Jason M. Marx  
Hannah Beswick-Hale  
HALE & MONICO LLC  
53 W Jackson Blvd., Suite 334

Chicago, IL 60604  
p. (312) 341-9646  
e. [azecchin@halemonico.com](mailto:azecchin@halemonico.com)