

EXHIBIT 1

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

In re: WATTS COORDINATED
PRETRIAL PROCEEDINGS

)
) Master Docket Case No. 19-cv-01717
)
) Judge Franklin U. Valderrama
)
) Magistrate Judge Sheila M. Finnegan
)

THIS DOCUMENT RELATES TO CASE NO. 17-CV-02877

**PLAINTIFF LIONEL WHITE SR.'S FEDERAL
RULE OF CIVIL PROCEDURE 26(a)(2) DISCLOSURES**

Plaintiff Lionetta White, on behalf of the Estate of Lionel White Sr., by and through her counsel, provide the following disclosures according to Federal Rule of Civil Procedure 26(a)(2):

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B), Plaintiff discloses the following individuals:

1. **Allison D. Redlich, Ph.D.** – Dr. Redlich may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify on the subject matter discussed in her report produced in this case, as well as any deposition conducted. The report includes a statement regarding her compensation as well as a list of cases in which she has testified as an expert at trial or by deposition in the past 4 years, attached hereto.

2. **Jon Shane, Ph.D.** – Dr. Shane will provide expert testimony as reflected in his reports previously disclosed in *Baker v. City of Chicago*, 16-CV-8940 on April 1, 2024 and in *Gipson v. City of Chicago*, 18-cv-5120 on June 3, 2024, and as reflected in his depositions in those cases. Dr. Shane's curriculum vitae has been previously produced in connection with those reports. Dr. Shane's compensation schedule is the same as previously provided in those cases. In

addition to prior testimony disclosed in those cases, Dr. Shane has given deposition testimony in *Gipson v. City of Chicago*, 18-cv-5120.

3. **Jeffrey Danik** – Mr. Danik will provide expert testimony as reflected in his reports previously disclosed in *Baker v. City of Chicago*, 16-CV-8940 on April 1, 2024 and in *Gipson v. City of Chicago*, 18-cv-5120 on June 3, 2024, and as reflected in his depositions in those cases. Mr. Danik’s curriculum vitae has been previously produced in connection with those reports. Mr. Danik’s compensation schedule is the same as previously provided in those cases. In addition to prior testimony disclosed in those cases, Mr. Danik has given deposition testimony in *Gipson v. City of Chicago*, 18-cv-5120.

4. **Terrill Swift** – Mr. Swift may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify regarding the subject matter discussed in the report produced in this case. The required information concerning his compensation has been provided in the attached report. Mr. Swift has never previously testified as an expert witness in a civil proceeding.

5. **George Adamson** – Mr. Adamson may be called to present evidence at trial pursuant to Rules 702, 703, or 705 of the Federal Rules of Evidence and is expected to testify regarding the subject matter discussed in the report produced in this case. The required information concerning his compensation has been provided in the attached report. Mr. Adamson has never previously testified as an expert witness in a civil proceeding.

Respectfully submitted,

/s/ Gianna Gizzi
One of Plaintiff’s Attorneys

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CERTIFICATE OF SERVICE

The undersigned, Gianna Gizzi, hereby certifies that on August 19, 2024, a copy of the foregoing document was served on all counsel of record via electronic mail

