

EXHIBIT 91

**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 ALL CASES

NOTICE OF RULE 30(b)(6) DEPOSITION

PLEASE TAKE NOTICE THAT the depositions of the following individuals will be taken using stenography and video on agreed dates and times, all at Loevy & Loevy, 311 N. Aberdeen St., Chicago, Illinois 60607, pursuant to Federal Rule of Civil Procedure 30(b)(6). The Instructions and Definitions set forth in Plaintiff's prior discovery requests to Defendant City of Chicago are hereby incorporated into this Notice as though fully set forth herein.

As to counsel of record for the City of Chicago, this is a demand upon you to designate and produce the person(s) who can provide binding testimony on behalf of the City of Chicago pursuant to FRCP 30(b)(6) on the following subjects:

1. Any investigation(s) into any of the Defendants in the Coordinated Proceedings, including but not limited to the joint investigations that the City conducted with the Cook County State's Attorney and/or federal authorities.
2. Any restrictions on the City's ability to discipline any of the Defendants or otherwise change their assignments or responsibilities.
3. The reason or reasons that neither Watts nor Mohammed was stripped of police powers before November 2011.

4. The reason or reasons that any of the Defendants were placed on desk duty and/or stripped of police powers, and the reason or reasons that any of those decisions were reversed.

5. Any promotions of Alvin Jones, Douglas Nichols, and Ronald Watts, including but not limited to the reasons they received promotions and the efforts to locate documents relating to those promotions.

6. Any requests by Ronald Watts to receive new or different assignments with the Chicago Police Department.

7. The supervision of Ronald Watts from 1999-2011, including the identity of individuals who were responsible for supervising Watts.

8. The data held by the Chicago Police Department for CRs initiated between 1999 and 2011, including the reports and data access tools available to CPD to query information associated with CRs.

9. The City's communications with the Cook County State's Attorney's Office regarding efforts to vacate convictions stemming from arrests made by Ronald Watts or members of tactical teams that he supervised (including but not limited to the 264 tactical team).

10. COPA's investigation of the Log Nos. listed in COPA-WATTS_057299-COPA-WATTS_05731, including policies and procedures such as the CPD Command Channel and Chicago Police Board Review Process (attached hereto as Exhibit A) relating to the decision to make information about those investigations public.

11. The disciplinary system(s) within the Chicago Police Department available to address CRs initiated between 1999-2011.

12. The Chicago Police Department's practices and policies for conducting confidential CR investigations and CR investigations associated with allegations of criminal conduct between 1999 and 2011.

13. The City's (a) written and unwritten policies, practices, and customs and (b) training in effect from 1999-2011, relating to each of the following:

a. Preparation and approval of arrest reports and related reports (such as vice case reports and inventory sheets), including but not limited to the role of each officer who is listed on such a report, as well as who is supposed to sign such reports, and the use of quotation marks on reports.

b. The use in official reports of abbreviations such as R/O and A/O instead of listing participating officers by name.

c. Completion of the "Complaint for Preliminary Examination," including but not limited to the role of each officer whose signature appears on the Complaint.

d. Internal investigations of allegations that police officers engaged in potentially criminal conduct.

e. Qualifications required to become a member of a tactical team operating in or around the Ida B. Wells housing development.

f. Responsibilities of tactical teams operating in the Second District and/or the Ida B. Wells housing development.

g. Responsibilities of sergeants overseeing tactical teams operating in the Second District and/or the Ida B. Wells housing development.

h. The provision of CR files to the CCSAO or defense attorneys in drug and gun cases.

- i. The meaning and significance of the term “lead allegation” as it relates to CRs.
- j. The collection, inventory, and testing of suspected narcotics.
- k. The collection and inventory of money from individuals who are arrested or detained.
- l. Reverse sting operations, including any materials used in reverse stings, such as reverse sting kits.
- m. Premises checks in the Second District.
- n. Merit promotions.
- o. The use of confidential sources, confidential informants, and concerned citizens in connection with drug arrests.
- p. The code of silence, including the City’s position as to whether a code of silence existed during any part of the years 1999-2011, and any efforts to address the code of silence.
- q. The supervision of tactical teams and tactical team officers.
- r. Systems such as early warning systems in place to monitor officers for potentially wrongful behavior.
- s. Joint investigations with outside entities such as the Cook County State’s Attorney’s Office and/or federal government agencies.

14. The person(s) with final policymaking authority for the City of Chicago on each of the subjects set forth in Topics 10-13 above. To the extent that anyone or any entity with final policymaking authority has delegated such authority, please identify that delegee or those delegees and produce those individual(s) pursuant to this Notice.

15. The City's efforts to locate and produce files responsive to Plaintiff's document requests in the Coordinated Proceedings.

The person(s) designated pursuant to this Notice should produce, at least seven (7) days prior to the deposition, any and all documents related to the above topics within their possession, custody, or control, or, if the documents have already been produced in this litigation, identify those documents by bates number.

Dated: February 8, 2023

Respectfully Submitted,

/s/ Scott Rauscher

One of the Attorneys for the Plaintiffs Represented by Loevy & Loevy in the Coordinated Proceedings

Arthur Loevy
Jon Loevy
Scott Rauscher
Josh Tepfer
Theresa Kleinhaus
Sean Starr
Wallace Hilke
Gianna Gizzi
LOEVY & LOEVY
311 N. Aberdeen St., Third Floor
Chicago, IL 60607

/s/ Joel A. Flaxman

One of the Attorneys for Plaintiffs Represented by Kenneth N. Flaxman, P.C. in the Coordinated Proceedings

Joel A. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave, Ste 201
Chicago, IL 60604
(312) 427-3200

CERTIFICATE OF SERVICE

I, Scott Rauscher, an attorney, certify that on February 8, 2023, I caused the foregoing Notice of Rule 30(b)(6) Deposition to be served on counsel of record for all parties via electronic mail.

/s/ Scott Rauscher