

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

Lavelle Taylor, )  
 )  
 Plaintiff, )  
 ) No. 17-cv-3642  
 -vs- )  
 ) (Judge Wood)  
 City of Chicago, et al., )  
 )  
 Defendants. )

# STATUS REPORT

The parties submit the following status report pursuant to the  
**THIRD AMENDED GENERAL ORDER 20-0012:**

1. Progress of Discovery: Before entry of the first COVID-19 Public Emergency Order on March 17, 2020, the parties were working diligently towards completing fact discovery by June 12, 2020. Four fact witnesses were served and failed to appear for their depositions. Additionally, the following depositions were scheduled for dates after the entry of the first COVID-19 Public Emergency Order on March 17, 2020: Lowell Taylor, Lisa Redmond, Michael Woods and Defendant Gerard Carroll. However, given the pandemic and the shelter-in-place order the parties postponed these depositions. The parties will meet and confer to explore the logistics of depositions proceeding by way of video.

2. Status of Briefing on Any Unresolved Motions: There is no unresolved motion.

3. Settlement Efforts: The parties will assess settlement prospects at the conclusion of fact discovery.

4. Agreed Proposed Schedule for the Next 45 Days: The parties will meet and confer regarding the likelihood of locating and serving fact witnesses. Additionally, the parties will meet and confer to explore the logistics of deposing such fact witnesses via video. Finally, the parties have been working and will continue to work to resolve 404(b) witness issues and limit the number of police department witnesses disclosed.

5. Agreed Proposed Revised Discovery and Dispositive Motion Schedule: In light of the pandemic and additional written and oral discovery that needs to be conducted in the case, the parties request that the Court vacate the current fact discovery deadline. The parties jointly request that Judge Wood set a status hearing for a date 60-90 days in the future to discuss a new fact discovery closure date. The parties are not requesting that this Court set expert discovery or dispositive motion deadlines at this time. The parties do not believe a hearing is necessary on this request, or any other issue, unless requested by the court.

6. Agreed Action that the Court Can Take without a Hearing: The parties request that the Court vacate the current fact discovery deadline and set a hearing to reevaluate a discovery schedule in 60-90 days.

7. Telephonic Hearing: Not at this time.

Respectfully submitted,

/s/ Joel A. Flaxman

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