

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

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

**STATUS REPORT**

The parties submit the following status report pursuant to the Court's  
Order of June 11, 2020:

1. **The Current State of Discovery:** Since the previous status report, Plaintiff has answered outstanding written discovery requests issued by the Defendant Officers.

Additionally, defendants have sought to depose four non-party witnesses. These depositions have not gone forward because those witnesses could not be served with subpoenas. In attempting to serve these witnesses, defendants learned that one witness moved out of state. Defendants are attempting to locate that witness' new address and serve him. Defendants believe they have the proper address for the three other witnesses, and have spoken to two of those witnesses, but those witnesses

have failed to cooperate with accepting service. Defendants will continue to attempt to serve and depose these witnesses.

The parties will continue to meet and confer to determine how to go forward with these and other remaining depositions in light of the continuing COVID-19 pandemic and difficulties in effectuating service on third party witnesses.

The parties have met, conferred, and reached an agreement on the number of alleged Rule 404(b) witnesses that will be offered by Plaintiff during discovery. Plaintiff is in the process of narrowing his list of alleged Rule 404(b) witnesses and when that is tendered, defendants will begin serving deposition subpoenas on those witnesses.

The parties are not aware of any discovery disputes that will require the Court's involvement.

**2. A proposed date for the completion of all discovery, including expert discovery:** The parties propose February 19, 2021 for the completion of fact discovery and June 21, 2021 for the completion of expert discovery.

**3. The parties' views regarding prospects for settlement:** The parties will assess settlement prospects at the conclusion of fact discovery.

4. **Whether the parties require an in-court status hearing:** The parties do not require an in-court status hearing.

Respectfully submitted,

/s/ Joel A. Flaxman

Joel A. Flaxman  
Kenneth N. Flaxman  
200 S Michigan Ave Ste 201  
Chicago, IL 60604-2430  
(312) 427-3200  
*attorneys for plaintiff*

/s/ Brian J. Stefanich (with consent)

Andrew M. Hale  
Brian J. Stefanich  
Allyson L. West  
Hale Law LLC  
53 W. Jackson, Suite 330  
Chicago, IL 60604  
312-870-6908  
*attorneys for defendants O'Brien and Carroll*

/s/ Daniel M. Noland (with consent)

Terrence M. Burns  
Paul A. Michalik  
Daniel M. Noland  
Elizabeth A. Ekl  
Katherine C. Morrison  
Reiter Burns LLP  
311 South Wacker Dr., Suite 5200  
Chicago, Illinois 60606  
312.982-0090  
*attorneys for defendant City of Chicago*