

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

Montrell Carr, et al.,)	
)	
<i>Plaintiffs</i>)	1:17-cv-07135
)	
-vs-)	(Judge Martha M. Pacold)
)	
Cook County et al)	(Magistrate Judge Weisman)
)	
<i>Defendants</i>)	

STATUS REPORT

The parties submit the following status report:

1. **Progress of Discovery:** Defendants have completed the depositions of the two named plaintiffs. The deposition of Jorelle Alexander, DMD, as representative of defendant, is scheduled for Friday, September 25, 2020. This will complete discovery on class certification.

2. **Status of Briefing on Any Unresolved Motions:** None.

3. **Settlement Efforts:** The parties will revisit settlement after ruling on class certification.

4. **Agreed Proposed Schedule for the Next 45 Days:** The parties propose the following schedule for briefing on class certification (assuming that the deposition of Dr. Alexander goes forward on September 25, 2020):

Plaintiffs to file motion for class certification on October 26, 2020;
Defendants to respond on November 23, 2020;
Plaintiffs to reply on December 7, 2020.

5. **Agreed Proposed Revised Discovery and Dispositive Motion**

Schedule: The parties agree that additional discovery should be deferred pending ruling on class certification.

6. **Agreed Action that the Court Can Take without a Hearing:**

None.

7. **Telephonic Hearing:** Not required at this time.

Respectfully submitted,

/s/ Kenneth N. Flaxman
Kenneth N. Flaxman
200 S Michigan Ave
Chicago, IL 60604
(312) 427-3200
An attorney for Plaintiffs

/s/ Monica Burkoth (with consent)
Monica Burkoth
Johnson & Bell
33 W Monroe
Chicago, IL 60603
*An attorney for Defendant Cook
County*

/s/ Meghan White (with consent)
Meghan White
Sanchez Daniels & Hoffman LLP
333 W. Wacker Drive, Chicago,
Illinois 60606
An attorney for Defendant Sheriff