

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

QUINTIN SCOTT, et al.,

*Plaintiffs,*

V.

SHERIFF OF COOK COUNTY and  
COOK COUNTY, ILLINOIS

*Defendants.*

Case No. 17-cv-7135

Hon. Martha M. Pacold

Magistrate Hon. David Weisman

## JOINT STATUS REPORT

The parties, by their respective counsel, submit this joint status report pursuant to the Court's order of July 1, 2025:

1. On June 30, 2025, Defendants made Rule 68 offers of judgment to all plaintiffs. The offers of judgment expired on July 14, 2025. Darius Scott is the only plaintiff who accepted the offer of judgment. (Notice of Acceptance, ECF No. 253.)

2. On July 17, 2025, Defendants served written discovery on the remaining plaintiffs. Plaintiffs' counsel will be unavailable for approximately three weeks. Defense counsel has agreed to extend the time allowed for the plaintiffs to respond to written discovery by 21 days, until September 8, 2025.

3. Defendants will seek the depositions of plaintiffs and anticipate being able to complete the depositions by the end of September 2025. Plaintiff's counsel agrees to this schedule.

4. As set forth in the previous status report, plaintiffs seek the following supplemental discovery relevant to numerosity and the class definition:

- a. Dental grievances submitted after December 31, 2017, the date last produced.
- b. Dental appointment record after August 31, 2018, the date last produced.

- c. Oral Surgery Referrals after August 31, 2018, the date last produced.
- d. Transport logs after August 31, 2018, the date last produced.
- e. Plaintiffs also will seek to undertake a Rule 30(b)(6) deposition to determine if any changes have been made in the policy plaintiffs challenge in this case and, if there have been changes, what impact this will have on the proposed closing date of the putative class.

5. The Sheriff's Office has concerns regarding the number of grievances plaintiff is asking the Sheriff's Office to supplement (almost eight years of grievances). The Sheriff's Office is gathering more information on the feasibility of producing grievances over such a long period of time and has requested additional time to formulate its position.

6. Cook County has agreed to supplement some version of the information plaintiffs have requested regarding oral surgery referrals. However, Cook County has concerns about producing duplicative information in different formats, which unnecessarily increases the cost of litigation. Defense counsel is in the process of setting up another meeting with Cook County to get more information on which information is duplicative and whether the requested information can be produced in a single format.

7. Given plaintiffs' counsel's unavailability over the next three weeks, the parties respectfully request to submit another joint status report in four weeks, by August 18, 2025, to update the Court on the progress of supplemental production. This will allow the parties to try to reach an agreement without court involvement.

Respectfully submitted,

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