

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

## JOINT STATUS REPORT

The parties submit this joint status report pursuant to the Court's order of November 20, 2025:

1. Plaintiff DeSavieu has been deposed. Plaintiff will file a motion for leave to file an amended complaint by December 15, 2025. The proposed amended complaint will drop Ernest Brown and Mohammad Abid as named plaintiffs and add Cortez Crayton, a member of the putative class, as a named plaintiff. Defendants will not know whether they oppose the motion until after it is filed and defense counsel has had an opportunity to discuss the motion with his clients

2. Plaintiffs believe that Defendants have not fully responded to plaintiffs' request to supplement their pre-appeal responses to plaintiff's written discovery requests. Defendants disagree with plaintiffs' assessment. On November 6, 2025, plaintiffs emailed the information they were asking defendants to supplement. On November 18, 2025, defendants produced the supplemental information that plaintiffs requested. Thereafter, plaintiffs stated they were looking for other information. Defendants have requested plaintiffs to identify the production

request they are asking defendants to supplement so that defendants are clear on what is being requested and so that plaintiffs' requests do not become an endlessly moving target that defendants must address.

3. The parties jointly request that the Court extend the discovery cut-off period to January 30, 2026 to allow time for the parties to address this remaining class discovery matter. Depending on the outcome of plaintiffs' motion for leave to amend their complaint, the parties may request a final extension of the discovery cutoff period.

Respectfully submitted,

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