

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

Leticia Vargas, Administrator of
the Estate of Angel Cruz,

Plaintiff,

-VS-

Sheriff of Cook County, County of Cook,
Augustus Alabi, Avis Calhoun, Lorraine Chatman,
Anita Johnson, Helen Kanel, Cherri Krzyzowski,
Elizabeth P. Lassen, Manuel Manalastas,
Dr. Steve Paschos, Jason Sprague, and
Jaruwan Supasanguan,

Defendants.

No. 18-cv-1865

Judge Steven C. Seeger

JURY DEMANDED

JOINT STATUS REPORT

Now come the Parties through Counsel and hereby submit this joint initial status report per the Third Amended General Order 20-0012:

1. Parties and Names of Attorneys

Plaintiff

Kenneth N. Flaxman knf@kenlaw.com
Joel Flaxman jaf@kenlaw.com
Kenneth N Flaxman, PC
200 S. Michigan Ave, Suite 201
Chicago, Illinois 60602
(312) 427-3200

Counsel for Defendants

Francis J. Catania, ASA
francis.catania@cookcountyil.gov
 Counsel for Sheriff of Cook County

William Ragen, ASA
william.ragen@cookcountyil.gov
Counsel for Cook County and Individually
Named Cook County Employees
Cook County State's Attorney's Office
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-5440

2. Progress of discovery

In this case fact discovery was to end on March 31, 2020, but was extended by operation of the Second, and Third Amended General Orders No. 20-0012. As provided by these

orders, the current fact discovery closure date is June 16, 2020. As this Court contemplated in its March 18, 2020 order, there are and will be difficulties in completing oral discovery. A status hearing is set for June 3, 2020 at 9:00 a.m.

Below is a list of the depositions that have been taken and that remain to be taken.

Depositions that have been completed

Dr. Pierre Nunez
Avis Calhoun (Mental Health Specialist)
Helen Kanel RN
Manuel Manalastas RN
Dr. Elizabeth Lassen
Jason Sprague (Mental Health Specialist)
Part 1 of Anita Johnson (Mental Health Specialist) (continuance agreed to by parties)
Dr. David Kelner
Lorraine Chatman RN
Leticia Vargas
Joel Castillo
Augustus Alabi RN
Dr. Steve Paschos

Depositions of Persons that Were Scheduled Prior to Emergence of COVID-19, but have been continued due to difficulty of doing depositions during COVID-19 pandemic

Wanda Estes, RN
Part 2 of Anita Johnson
Officer Guerra (Employee of Sheriff)
Officer Crawford (Employee of Sheriff)
Officer Holtz (Employee of Sheriff)
Officer Anderson (Employee of Sheriff)
Officer Smith (Employee of Sheriff)
Officer Campbell (Employee of Sheriff)
Aiste Baskaускаite RN (Hinsdale Hospital)
Tiago Soltes RN (Hinsdale Hospital)
Meghan Weger (Hinsdale Hospital)
Katia Koleva (Hinsdale Hospital)
Dr. Ali Farahaz (Hinsdale Hospital)
Dr. Hythem Zayed (Hinsdale Hospital)
Dr. Ravi Yalamanchi (Hinsdale Hospital)
Officer Sodt (Countryside Police)
Officer Stern (Countryside Police)

Delays have occurred due to unavailability of correctional staff who are required to be present at the Cook County Department of Corrections in response to COVID-19. Treater Depositions have also been stayed for similar reasons.

3. Status of briefing on any unresolved motions

N/A.

4. Settlement Efforts

There are no current settlement discussions.

5. Proposed schedule for the next 45 days

The parties request a hearing before the Court to set a new discovery closure date. The parties acknowledge that this is a non-urgent request. The June 3, 2020 hearing date should suffice.

6. Proposed revised discovery and dispositive motion schedule

N/A.

7. Agreed action that the Court can take without a hearing

None.

RESPECTFULLY SUBMITTED BY:

/s/ Joel A. Flaxman
PLAINTIFF
Kenneth N. Flaxman, PC
200 S. Michigan Ave., Suite 201
Chicago, Illinois 60602
(312) 427-3200

/s/ Francis J. Catania
DEFENDANT SHERIFF
Assistant State's Attorney
Civil Rights Section
500 Richard J. Daley Center
Chicago, Illinois 60602
(312) 603-7930

/s/ William R. Ragen
DEFENDANT COOK COUNTY and
INDIVIDUALLY NAMED COOK COUNTY
EMPLOYEES
Assistant State's Attorney
Civil Rights Section
500 Richard J. Daley Center
Chicago, Illinois 60602
(312) 603-7944