

**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-	)	No. 18-cv-1865
	)	
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,	)	Judge Steven C. Seeger
	)	
	)	
Defendants.	)	
	)	

**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](mailto:knf@kenlaw.com)  
Joel Flaxman [jaf@kenlaw.com](mailto: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@cookcountyl.gov](mailto:francis.catania@cookcountyl.gov)  
Counsel for Sheriff of Cook County  
  
William Ragen, ASA  
[william.ragen@cookcountyl.gov](mailto:william.ragen@cookcountyl.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) (continuuation 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 Baskauskaite 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