

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:

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INDIVIDUALLY NAMED COOK COUNTY
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Leticia Vargas, Petitioning Administrator of the Estate of Angel Cruz,	)	
	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 18-cv-01865
	)	
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,	)	Honorable Steven C. Seeger
	)	
	)	
	)	
	)	
Defendants.	)	Jury Demand
	)	

NOTICE OF FILING / CERTIFICATE OF SERVICE

To: Joel Flaxman, Esq. 200 S. Michigan Ave Suite Chicago, Illinois 60602	Frank Catania 500 Daley Center Chicago, Illinois 60602
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PLEASE TAKE NOTICE that on May 18, 2020, I caused to be filed with the Clerk of Court for the Honorable John Steven Seeger in courtroom 2319 of the United States District Court, Northern District of Illinois, Eastern Division, the parties' Joint Status Report.

KIMBERLY M. FOXX
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By /s/ William R. Ragen
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CERTIFICATE OF SERVICE

I, William R. Ragen, Assistant State's Attorney, certify that, in accordance with Fed. R. Civ. P. 5, LR 5.5, and the General Order on Electronic Case Filing (ECF), I served this Notice, together with the documents herein referred, electronically via the ECF-CM system to the above-named attorneys on May 18, 2020.

/s/ William R. Ragen
Counsel for County of Cook and Individually

Named Cook County Employees