

**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

STATEMENT PURSUANT TO ORDER OF MAY 19, 2020

The Parties, through their respective undersigned counsel, submit the following in respond to the Court's Order of May 19, 2020, requesting a "more fulsome showing" regarding the remaining depositions in this matter:

1. Plaintiff seeks the depositions of six Jail employees who interacted with plaintiff's decedent at the Cook County Jail. These will be short depositions; each should require no more than 90 minutes. These depositions were scheduled for March 17, 2020 and March 20, 2020. These depositions will provide information about the events that preceded the death of plaintiff's decedent. The parties agreed to postpone the depositions on March

2. The parties had also sought to schedule, before the cancellation of all depositions, the depositions of health care providers who had interacted with plaintiff's decedent at Hinsdale Hospital immediately before he was admitted to the Jail. Four of these depositions had been scheduled (with counsel for the hospital employees) for March 24 and 25. The other three

deponents (Dr. Zayed, Dr. Yalamachi, and Tiago Soltes RN) were with subpoenas on January 31, 2020; the parties were conferring with counsel to schedule the depositions of these individuals on the same days as the depositions of other personnel at Hinsdale Hospital or shortly thereafter.

3. The remaining four depositions that the parties seek to conduct are:
 - a. Wanda Estes, a healthcare worker at the Jail who was present when plaintiff's decedent was found unresponsive in his cell. Counsel for defendant Cook County agreed to produce Estes for a deposition, which the parties expected to proceed in the last week of March, though an exact date had not been set when all depositions were postponed,
 - b. Anita Johnson, a defendant who was involved in the treatment of plaintiff's decedent at the Jail. Defendant Johnson's deposition began on September 20, 2019. Her counsel requested that questioning on a matter for which Johnson has separate counsel be postponed to a later date, and plaintiff agreed. The continuation of defendant Johnson's deposition was scheduled for March 16 at 11 a.m. It was cancelled on March 15 via email by agreement of the parties.
 - c. Police officers Sodt and Stern of Countryside who arrested plaintiff's decedent. These witnesses notified defense counsel that they would be available on March 30 and 31st; the parties did not schedule these depositions because of the COVID orders.

RESPECTFULLY SUBMITTED BY:
[signatures on next page]

/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